



November 2, 2017

Ms. Barbara Gross
Manager, Permits Section
Land Division
United States Environmental Protection Agency
Region 9
45 Hawthorne Street
San Francisco, CA 94105-3901

Re: Clean Harbors Los Angeles, LLC
CAD 050 806 850

Dear Ms. Gross,

This letter is our initial response to your September 28, 2017 letter to Steve Peterson and me. We will provide additional information as requested in your letter in a follow up communication.

As an initial matter, we wish to correct and supplement the factual record concerning the Clean Harbors Los Angeles, LLC (CHLA) facility. First and most importantly, the facility has not been transferred to a new owner, and the ownership of the facility has not changed. The owner, operator and permittee at the facility is still CHLA. As stated in my August 31 letter attached to a September 11 email correspondence, as a result of the transaction by which Emerald Transformer Western States acquired the parent of CHLA, CHLA's name is changing to Emerald Transformer Los Angeles LLC. We will submit a formal request to EPA Region 9 and California state agencies, including the Department of Toxic Substances Control, in recognition of this name change.

It bears repeating that the entity that owns and operates the facility is not changing. Nor has the parent company of CHLA changed – it is and will remain Transformer Services Holdco, LLC. The only change will be to the name of the facility owner/operator/permittee.

Also as a result of the transaction, Clean Harbors Inc. no longer wishes to provide financial assurance for the CHLA facility. We have submitted to you proposed replacement financial assurance for the CHLA facility and will supplement that information as requested in your letter.

The background section of your letter concerning facility ownership summarizes correspondence dated May 11, 2017 and June 12, 2017, as well as a telephone conference on July 7, 2017. There was also a June 30, 2017 telephone conference during which Clean Harbors and Emerald personnel discussed the proposed transaction with EPA personnel and reiterated their view that the transaction would not constitute a transfer of the facility to a new owner.

Your September 28 letter contains six requests for information, which we repeat here (in italics). Our preliminary responses to each request are the following. We will supplement them as indicated here.

1. U.S. EPA has received submittals from Emerald on July 12, 2017 and September 11, 2017. These submittals were not accompanied by the certification statement and signature of a Responsible Official as required by 40 C.F.R. § 761.3. In accordance with Subsection IV.B.3 of the Approval, all documents which are to be considered by U.S. EPA must be resubmitted with the certification statement and signature.

Response: We acknowledge this request and will submit formal requests for EPA consideration with a certification statement and signature as required by 40 C.F.R. § 761.3.

2. Emerald on July 12th identified Emerald Transformer Western States LLC as "building and land owner" in the submitted "Facility TSCA Permit Application Administrative Updates." Provide the date that Emerald Transformer Western States, LLC became the land owner of the Facility.

Response: Emerald Transformer Western States LLC ("ETWS") is not the facility building and land owner. ETWS is the parent company of Transformer Services Holdco, LLC. CHLA remains the owner of the building and land, as evidenced in the enclosed deed. Please note that we intend to file an affidavit in the land records indicating that the name of CHLA has changed to Emerald Transformer Los Angeles LLC.

3. In July Clean Harbors Inc. clarified to U.S. EPA that William Connors is a responsible official of the parent company Clean Harbors Inc. but not an employee of CHLA that transferred over with the Facility to Emerald. Thus, the affidavit submitted by Mr. Connors in relation to CHLA's transfer to Transformer [Services Holdco, LLC] in Clean Harbors Inc.'s internal reorganization does not fulfill the requirement in Subsection VI.B.1.a of the Approval to submit a notarized affidavit signed by the transferee stating that the transferee will abide by the Approval. Transferee must submit an affidavit.

Response: We acknowledge this request and will submit a notarized affidavit signed by an official of the transferee, CHLA, with respect to the reorganization by Clean Harbors that resulted in Transformer Services Holdco, LLC becoming the parent of CHLA.

4. Submit a Revised TSCA PCB Commercial Storage Permit Application as a legible pdf document.

Response: The Revised TSCA PCB Commercial Storage Permit Application has been completed. The signed hard copy will be sent to the Agency separately. A marked up version has been enclosed following this response.

5. Provide a copy of the financial assurance documents for the Facility's RCRA permit that you have submitted to the California Department of Toxic Substances Control (DTSC).

a. Provide an explanation of the financial assurance documents submitted to DTSC, including financial assurance documents related to closure and sudden accidental occurrences. The Facility's coverage for sudden accidental occurrences is discussed in section 9.14.3 of the RCRA Part "B' Application that is incorporated as Appendix C to the Approval.

b. Clearly identify which financial instrument(s) are being used for obligations under the RCRA permit versus obligations under the TSCA Approval, and identify documents being utilized for both RCRA and TSCA Approval obligations. Clearly explain the cost estimates being used and how each obligation is being met. For example, is Surety bond number 1143853 (attachment "Performance Bond_LA2 063017"), with the face value of \$1,263,267, being used for the RCRA permit?

[c.] U.S. EPA has reached out to DTSC and recommends that the Facility coordinate as necessary with both U.S. EPA and DTSC to ensure that all financial assurance documents are submitted to the appropriate agency in the correct format, with the correct language, and adjusted for inflation.

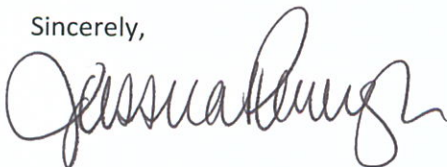
Response: We acknowledge this request and will submit the requested information to EPA and DTSC in the near future. We also will coordinate our response with both agencies.

6. A properly executed and properly submitted Standby Trust Agreement must be submitted to U.S. EPA Region 9 with the bond(s). Please see the enclosed Standby Trust Agreement that contains the current language for standby trusts for PCB storage facilities. Sending a pdf copy is not considered proper submission of the required financial assurance documents. An originally signed duplicate of the trust agreement must be submitted to U.S. EPA Region 9 with the surety bond. See 40 C.F.R. §§ 765(g) and 264.143(c)(1) and 264.143(c)(3)(i).

Response: We acknowledge this request and will submit to EPA in the near future a standby trust agreement as required by the applicable regulations.

If there is anything additional required of Emerald Transformer regarding this information, please do not hesitate to let me know.

Sincerely,



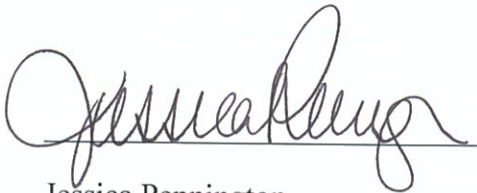
Jessica Pennington
Emerald Transformer
Director of Safety and Environmental Compliance
jpennington@emeraldtransformer.com
850-401-3200

Enclosure

cc: Mr. Steve Peterson
Mr. Joe Christopher

Certification Statement

“Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying this document is true, accurate, and complete. As to the identified section(s) of this document for which I cannot personally verify the truth and accuracy, I certify as the company official having supervisory responsibility for the persons who, acting under my direct instructions, made the verification that this information is true, accurate, and complete.”

A handwritten signature in dark ink, appearing to read 'Jessica Pennington', written over a horizontal line.

Jessica Pennington

Director of Safety and Environmental Compliance

Emerald Transformer

11/2/2017
Date

**EMERALD TRANSFORMER~~CLEAN HARBORS~~ LOS
ANGELES, LLC
Los Angeles, California**

**TSCA COMMERCIAL STORAGE
PERMIT RENEWAL APPLICATION**

October~~December~~ 2017~~0~~



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1. INTRODUCTION

This document constitutes an application submitted by ~~Emerald TransformerClean Harbors~~ Los Angeles, LLC (~~ETCHLA~~) to the U.S. Environmental Protection Agency (EPA) for a renewal of the existing authorization to allow the storage of polychlorinated biphenyls (PCBs). ~~Emerald TransformerClean Harbors~~ Los Angeles, LLC is also authorized by its current State of California and U.S. EPA permit to store PCBs.

This introduction sets forth the purpose and organization of this application and provides general information regarding ~~Emerald TransformerClean Harbors~~ Los Angeles, LLC.

1.1 Purpose and Organization of Application

Under regulations issued by EPA and codified at 40 CFR Part 761.65(d), each Commercial Storer of PCB waste is required to submit an application to the U.S. EPA. This application is submitted pursuant to this requirement.

This application is organized in the same fashion and order as the information requirements specified in 761.65(d)(3), item (i) through (x).

Specifically, 761.65(d)(3), item (i) through (v) require information regarding the qualifications of the owner, operator, and principals and key employees of the applicant. This information is provided in Section 2 of this application.

Item (vi) requires an estimate of the maximum PCB waste quantity to be handled at the facility. This information is provided in Section 3.

Item (vii) requires a statement certifying compliance with PCB storage requirements (as specified in 761.65(b) or 761.65(c)). The certification and supporting documentation are contained in Section 3 of the application.

Items (viii) and (ix) require a closure plan and closure cost estimate, respectively. The required information is set forth in Sections 4 and 5 of this application.

Item (x) requires a demonstration of financial responsibility to meet closure cost estimates. This is provided in Section 7 of this application.

1.2 General Information

The ~~Emerald TransformerClean Harbors~~ Los Angeles, LLC facility is located at 5756 Alba Street in Los Angeles, California. ~~ETCHLA~~ is a treatment, storage, and disposal facility (TSDF) for hazardous and non-hazardous wastes. The facility receives wastes for storage, consolidation, and shipment to off-site treatment and disposal facilities.

~~ETCHLA~~ has occupied this present site since ~~June of 2017~~1979. In 1980, pursuant to new EPA regulations, the previous facility operator notified the EPA that it was operating as a transporter of hazardous wastes. At the same time, the facility began planning a

waste processing facility. Hazardous waste management applications were filed with the California Department of Health Services (DOHS) in 1984. The DOHS issued the facility a Hazardous Waste Facility Permit on June 3, 1985. The DOHS issued a revised permit on May 29, 1990. This permit was modified twice since that application. The most recent modification was effective February 28, 1995. The facility submitted a RCRA Part B permit re-application to the Department of Toxic Substances Control (DTSC) in November 1994 to renew the existing permit for a period of ten years. Several RCRA permit renewal applications have been submitted to the Department of Toxic Substances Control (DTSC) over the years as updates were necessary. The most recent RCRA permit renewal application was submitted in April 2010. The RCRA permit renewal application was accepted by the DTSC and subsequently the facility received a renewed Hazardous Waste Facility Permit effective January 27, 2011 and expires January 26, 2021, remains under review by the DTSC at this time.

The facility was initially authorized to operate as a commercial storage facility for PCBs on September 10, 1991. The initial authorization allowed for the storage of 6,900 pounds of PCB waste. An amendment dated December 19, 1991 revised the maximum storage capacity to 825 gallons and increased the time that PCB items may be stored outside the designated storage area from three business days to six days. A second amendment, dated May 5, 1994, provided interim authorization to use the additional PCB storage area within the Container Storage Warehouse. The use of this area increased the storage capacity to 8,745 gallons.

The ~~ETCH~~LA EPA identification number is CAD050806850.

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2. FACILITY OWNER/OPERATOR QUALIFICATIONS

An applicant for a PCB storage permit is required to include in the application, per 40 CFR 761.65(d)(3), information bearing on the qualifications of the facility's "principals and key employees" to engage in the business of commercial storage of PCB wastes. The information requirements are specified in subparagraph (i) through (v) of paragraph 761.65(d)(3).

The required information is set forth below. The paragraph numbers below correspond to the subparagraph (i) through (v) of 761.65(d)(3). The information required by subparagraph (A) more logically precedes the information required in subparagraph (D), and is therefore presented in that order.

2.1 Identification of the Owner and Operator, and Officials of the Facility with Direct Management Responsibilities

The owner and operator of the facility is Emerald Transformer Clean Harbors Los Angeles, LLC which is a wholly owned subsidiary of Emerald Transformer Western States, LLC Clean Harbors Inc. (CH).

The official of the facility who has direct management responsibility is Steven R. Peterson, Facility Manager, Emerald Transformer Clean Harbors Los Angeles, LLC.

2.2 Identification of the Person Responsible for Overall Operations of the Facility, and the Supervisory Employees Responsible for Operation of the Facility

The person with overall responsibility for operation of the facility is Steven R. Peterson, Facility Manager, Emerald Transformer Clean Harbors Los Angeles, LLC.

The supervisory employees responsible for operation of the facility are:

<u>Name</u>	<u>Position</u>
Steven R. Peterson	Facility Manager
<u>Jose Flores</u> <u>Abby Pourhassanian</u>	Operations <u>Manager</u> <u>Manager</u>
Jesus Vela	Operations Supervisor

2.3 Information Concerning the Technical Qualifications and Experience of the Persons Identified

A brief summary of the technical qualifications and experience of the persons identified above follows. Qualifications for their present positions derive in large part from prior experience as highlighted below:

Steven R. Peterson was named has been the Facility Manager of ETCHLA in June of since 201706 and has been in various positions of increasing responsibility since 1994 under the previous owner of the business. During the 8 years prior to 2006, he held the position of Operations Manager. For the 4 years prior to 1998 he held the positions of

Material Router, Field Supervisor, and Field Chemist. Mr. Peterson holds a B.S. degree in Chemical Engineering.

~~Jose Flores~~~~Abby Pourhassanian~~ has been Operations Manager since 2016. From 1993 to 2016, Mr. Flores held various supervisory positions within plant operations. ~~since 2006~~. ~~From 1993 to 2006~~, Mr. Pourhassanian was an Operations Supervisor. Mr. Pourhassanian was a Chemical Technician from 1990-1993. Prior to this, Mr. Pourhassanian held the position of Driver, Dispatcher, and Instructor since 1981.

Jesus Vela has been an Operations Supervisor since 2002. From 1997 to 2002, Mr. Vela was a Treatment Supervisor. Prior to this, Mr. Vela held the position of Chemical Technician since 1987.

2.4 A List of Companies Owned or Operated by the Persons Identified in Sections 2.1 and 2.2 Above, That Are or Were Involved With Waste Handling Activities

During the past five years, ~~Emerald Transformer~~~~Clean Harbors~~ Los Angeles, LLC as the owner and operator of ~~Emerald Transformer~~~~Clean Harbors~~ Los Angeles, LLC has not owned or operated any other companies or performed any waste handling activities other than for ~~Emerald Transformer~~~~Clean Harbors~~ Los Angeles, LLC.

~~Emerald Transformer~~~~Clean Harbors~~ Los Angeles, LLC is a wholly owned subsidiary of ~~Emerald Transformer Western States, LLC~~~~Clean Harbors, Inc.~~, which does own and operate a number of other companies.

During the past five years, neither the person responsible for overall operations of ~~Emerald Transformer~~~~Clean Harbors~~ Los Angeles, LLC nor the supervisory employees responsible for operation of the facility, owned or operated any companies other than ~~Emerald Transformer~~~~Clean Harbors~~ Los Angeles, LLC.

2.5 State or Federal Environmental Violations During the Past Five Years Involving Businesses Identified in Section 2.4 Above, Which Resulted in a Civil Penalty, Judgement of Conviction, or Civil Injunctive Relief, Involving Waste Handling Activities

The compliance history for the previous five year period for the business identified in Section 2.4 above is summarized in Appendix A.

3. FACILITY DESIGN 2

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3. FACILITY DESIGN

This section includes a discussion of the maximum storage and containment capabilities of the PCB storage area. The PCB storage area ~~isare~~ currently authorized by the U.S. EPA and the California Department of Toxic Substances Control. A signed certification of compliance with facility design standards follows in Section 3.2. The certification was also provided in the previous application. Finally, the storage areas ~~isare~~ described in terms of compliance with various facility standards.

This section is divided into three general subsections:

- Maximum Storage Capabilities
- Certification of Compliance with Facility Design Standards
- Facility Design and Construction Standards

3.1 Maximum Storage Capabilities

The portion of the facility dedicated to PCB storage consists of ~~onetwo~~ existing PCB storage areas, as well as existing RCRA storage areas. The storage areas permitted exclusively for RCRA activities are not addressed specifically in this PCB Storage Facility Permit renewal application, although the areas are depicted on the site drawings provided as a reference in Appendix B. ~~TheBoth~~ PCB storage areas ~~isare~~ for container storage only. There are no tanks included in this Application.

~~The first PCB Storage area is designated as a portion of the New Container Storage Pad, Containment Bay E. This area was referred to in the first application as the Drum Storage Pad, Containment Bay E. The name of this area has been changed to ensure consistency with the RCRA Part B permit. This bay is separated from other bays in the New Container Storage Pad by intermediate curbs and is currently authorized by the State of California and the EPA for the storage of fifteen 55-gallon equivalent containers of PCB liquids. The area is contained by a concrete containment structure and is roofed. A totally enclosed and roofed steel building is located within the containment area to store PCBs and to provide protection from rainfall. The final design and construction has been certified and submitted to the State of California and the EPA in accordance with permit provisions before the commencement of any PCB storage activity.~~

The ~~second~~ PCB storage area is in the contiguous Bay DW-3 and DW-6 of the Container Storage Warehouse. This bay was referred to in the previous application as Bay #1. The name of this area was changed to ensure consistency with the RCRA Part B permit and for inventory location purposes. There is no difference in the bay location or size from the previous application. This is exactly the same area with only a name change. The combined DW-3 and DW-6 bay are separated from other bays in the container Storage Warehouse by intermediate curbs and are currently authorized by the State of California and the EPA for the storage of 144 55-gallon equivalent containers of PCB liquids.

To establish the maximum authorized storage capacity for the PCB storage areas, floor plans were developed and are shown on the drawings included with this renewal application. The PCB storage layout is based on palletized 55-gallon equivalent containers and the arrangements are illustrative. PCB storage areas may contain varied sized containers including transformers, capacitors and other odd-sized containers. PCB storage capacity will not exceed maximum authorized volume (including liquid contents of transformers, drums, capacitors and other PCB articles) and adequate aisle space will be maintained. The floor plans establish an arrangement and maximum total count of 55-gallon equivalent containers that will be stored in each of the container storage areas. Based on the arrangements illustrated, and upon the assumption that all of the containers are full of liquid, a total authorized PCB storage volume is established for each container area. Table 3-1 lists the maximum authorized storage for the ~~two~~ PCB storage areas and available containment volume for ~~the each~~ area.

Table 3-1: Design Capacities and Containment Provisions for PCB Storage Areas

Location	Maximum Allowed PCB Storage (Gallons)	Containment Volume Required (Gallons)	Containment Volume Available (Gallons)¹
New Container Storage Pad Bay E	825	207	543
Container Storage Warehouse DW-3 & DW-6 (Formerly Bay #1)	7,920	3,300	5,423 ²

¹ -No rainfall allowance is included for ~~the either~~ storage area. ~~The area has~~Both have been constructed in an enclosed area not subject to rainfall.

² -Within the Container Storage Warehouse, 13,200 gallons of non-PCB waste are also stored in connecting bays to DW-3 and DW-6 in addition to the 7,920 gallons of PCB waste. The total containment required is calculated by adding 25% of the maximum volume of PCB waste stored in this area (1,980 gallons) to 10% of the maximum volume of non-PCB waste stored in this area (1,320). This results in a total containment requirement of 3,300 gallons.

3.2 Certification of Compliance With Facility Design Standards

The existing facility is in compliance with the Facility Design Standards specified in 40 CFR 761.65(b).

The following certification is made for compliance of the existing PCB facilities with facility design standards currently in effect:

Under the civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying this document is true, accurate, and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who, acting under my direct instructions, made the verification that this information is true, accurate, and complete.

Signature: _____

Printed Name: Joe L. Christopher Bonnie C. Martin

Date: October December 1846, 20170

3.3 Facility Design and Construction Standards

The facility design and construction standards are listed below for the PCB storage areas. The discussion follows the order of items specified in 40 CFR 761.65(b).

3.3.1 New Container Storage Pad — Bay E (Drawing P003-CC-107)

3.3.1.1 Roof and Walls

~~The New Container Storage Pad contains a totally enclosed and roofed steel building placed on the concrete floor within the 6-inch containment curb. The building is of weatherproof construction, designed and installed to resist wind-blown rainfall.~~

3.3.1.2 Floor and Curbing

~~A concrete floor with an epoxy surface coating is provided for the storage area inside the bay. The curbing is at least six inches in height. The containment volume available is 543 gallons as stated in Table 3-1. This containment volume exceeds the requirement for a containment volume of 25 percent of the maximum authorized PCB storage volume or two hundred percent of the internal volume of the largest PCB article or PCB container, whichever is greater.~~

3.3.1.3 Floor Penetrations

~~There are no drain valves, floor drains, unsealed expansion joints, sewer lines, or other openings that will permit liquids to flow from the curbed area.~~

3.3.1.4 Floor Construction

~~The floors and curbs are constructed of smooth and impervious Portland cement concrete which prevents or minimizes penetration of PCBs. A surface coating of an epoxy sealer has been applied to all exposed concrete surfaces to further seal the surface and retard any potential penetration of the surface by PCBs.~~

3.3.1.5 100-Year Flood Water Elevation

~~The entire site, including the storage pad floor, is above the 100-year flood water elevation.~~

3.3.1.6 Storage Capacities

~~The maximum PCB storage capacity and the maximum PCB storage inventory are the same volume of 825 gallons. This corresponds to the equivalent of fifteen 55-gallon equivalent containers. Items other than 55-gallons in size may be accepted for storage, but maximum internal liquid volume in storage at any one time will not exceed the stated value.~~

3.3.12 Container Storage Warehouse – PCB Storage Area (Drawing P003-CC-110)

3.3.12.1 Roof and Walls

The roof and walls are constructed of concrete filled masonry block and steel. The roof is sloped and served by gutters and downspouts to convey rainfall to drainage on the exterior to the building. Doors and other openings in the building have been designed and installed to resist wind-blown rainfall.

3.3.2.2 3.3.1.2 Floor and Curbing

A concrete floor with an impervious surface coating has been provided for all PCB storage areas inside the building. The curbing is at least six inches high. The containment volume available is 5,423 gallons for the area, which stores PCB containers and/or other articles. This exceeds the combined requirements for a containment volume of 25 percent of the maximum authorized storage volume of PCBs or two hundred percent of the internal volume of the largest PCB article or PCB container, whichever is greater, and a containment volume of 10 percent of the maximum authorized storage volume of RCRA waste or one hundred percent of the internal volume of the largest RCRA container, whichever is greater.

3.3.2.3 3.3.1.3 Floor Penetrations

There are no drain valves, floor drains, unsealed expansion joints, sewer lines, or other openings that will permit liquids to flow from the curbed area.

3.3.2.4 3.3.1.4 Floor Construction

The floors and curbs are constructed of smooth and impervious Portland cement concrete which prevents or minimizes penetration of PCBs. A surface coating of an epoxy sealer has been applied to all exposed concrete surfaces to further seal the surface and retard any potential penetration of the surface by PCBs.

~~3.3.2.5~~ 3.3.1.5 100-Year Flood Water Elevation

The entire site, including the Container Sludge Warehouse, is above the 100-year flood water elevation.

~~3.3.2.6~~ 3.3.1.6 Storage Capacities

The maximum PCB storage capacity and the maximum PCB storage inventory are the same volume of 7,920 gallons. This corresponds to the equivalent of 144 55-gallon equivalent containers. Items other than 55 gallons in size may be accepted for storage, but maximum internal liquid volume in storage at any one time will not exceed the stated value.

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4. PCB CLOSURE PLAN

The purpose of the PCB Closure Plan is to provide a detailed description of the activities that will be carried out to remove or decontaminate PCB waste residues from containment system components and building structures during the closure of the storage facility.

This PCB Closure Plan includes the following subsections:

- Facility Description
- Disposal of PCB Waste Inventory
- Closure Plan Sampling, Decontamination, and Spill -Cleanup Policy
- Other Closure Activities
- Closure Schedule
- Modifications to the PCB Closure Plan
- Closure Plan Checklist

4.1 Facility Description

This subsection discusses the background information pertinent to the CHLA facility. Items to be discussed in this subsection include:

- General Description
- Facility Location
- Site Specific Information
- Environmental Conditions of the Site
- PCB Waste Storage Facility Design

4.1.1 General Description

~~Emerald Transformer~~~~Clean Harbors~~ Los Angeles, LLC is a RCRA permitted treatment and storage facility that receives wastes for storage, consolidation, and shipment to off-site treatment and disposal facilities. ~~One~~~~Two~~ areas ~~is~~~~are~~ designated for storage of PCBs pending off-site treatment and disposal. No PCB treatment or disposal other than consolidation and bulking is performed on-site.

4.1.2 Facility Location

The facility located in an industrial area of Los Angeles, California, in U.S. EPA Region IX. The address of the facility is 5756 Alba Street, Los Angeles, California 90058.

4.1.3 Site Specific Information

The facility is located in the heavily industrialized area and occupies approximately 2.3 acres. The perimeter is completely fenced by an 8-foot corrugated steel fence topped by approximately 18-inches of concertina wire. The entire site is electronically monitored by protection equipment 24 hours per day. The property is relatively flat and paved as shown on Drawing P003-CC-102. The site is bounded on the south by a city street and railroad tracks, on the west by a city street, on the north by an industrial property, and on the east by a city street and railroad tracks.

The site is currently operating as a permitted RCRA and State of California hazardous and industrial waste storage facility. Tanks for storage as well as analytical laboratory facilities are present on the property. These facilities are totally separate from the PCB storage areas that are the subject of this PCB Closure Plan.

~~The New Container Storage Pad, Containment Bay E, and the Container Storage Warehouse, Bay DW-3 and DW-67, are~~ the sole locations for storage of PCBs. The locations ~~are~~ separate from the other containment bays within the ~~New Container Storage Pad and Container Storage Warehouse~~.

The site is located greater than one mile from any surface water body and is above the 100-year flood plain. Drawing P003-CC-102 provides additional details about the property.

Traffic enters from Alba Street through a secured gate. Internal traffic is limited to parking areas and loading and unloading areas.

4.1.4 Environmental Conditions of the Site

There are no surface water bodies located within one mile of the site. Rainfall run-off and run-on are not a problem since the PCB storage facilities ~~are~~ located indoors within bermed areas.

Records on file with the California Geological Survey indicate that there are water supply wells located within 1 mile of the site. The locations of record are shown on the Well Location Map in Figure 4-1.



REFERENCE: U.S.G.S. QUAD MAPS, LOS ANGELES, SOUTH GATE
INGLEWOOD AND HOLLYWOOD, CALIFORNIA.

Figure 4-1: Well Location Map

4.1.5 PCB Waste Storage Facility Design

The site areas used for storage of PCBs ~~is~~are the New Container Storage Pad, Containment Bay E, and the Container Storage Warehouse, Bay DW-3 & DW-6.

4.1.5.1 New Container Storage Pad—Containment Bay E

Containment Bay E is a square structure 20 feet long x 20 feet wide. The structure consists of a concrete slab surrounded by a containment berm. The pad is divided in half by a 6-inch high concrete berm. PCBs are stored on the south half of Containment Bay E within an area surrounded by a 6-inch high berm. On the west end of the PCB storage area is a 9.5-foot long, 6-inch wide, and 3-inch deep concrete trough to facilitate collection of any residues. PCBs are stored within a roofed steel enclosure located within the PCB storage area. Construction details for Containment Bay E are depicted on drawing P003-CC-107 contained in Appendix B. Specific dimensions and capacity are listed below:

Table 4-1: Bay E—Dimensions and Capacities

New Container Storage Pad Containment Bay E	Dimensions And Capacities
Overall Interior Dimensions Floor Area	20 Feet x 20 Feet 400 Square Feet
PCB Storage Area Dimensions Floor Area	9.5 Feet x 20 Feet 190 Square Feet
Containment Berm Height	6 Inches
Contained Storage Area ³	143 Square Feet
Net Containment Volume ³	543 Gallons
Design Storage Capacity Maximum Liquid Volume	15 x 55-Gal Containers 825 Gallons
Required Containment Volume	207 Gallons
Available Containment Volume	543 Gallons

4.1.5.12 Container Storage Warehouse

³—Net available area and volume after correction for containers and curb displacements. Trench area is included.
TSCA COMMERCIAL STORAGE PERMIT 5Emerald TransformerClean Harbors Los Angeles, LLC
OctoberDecember 20179 PCB CLOSURE PLAN

The Container Storage Warehouse consists of three separate storage bays. Bay #1 is a rectangular storage area 54 feet long x 34 feet wide. The structure consists of a concrete slab surrounded by a containment berm. The bay is divided into six separate storage areas consisting of open areas separated by 6-inch high concrete berms and a totally enclosed room. PCBs are stored in the two northernmost storage areas of Bay #1 designated DW-3 and DW-6. For purposes of containment calculations, all of the storage areas in Bay #1 are considered. Specific dimensions and capacities are listed below.

Table 4-12: Bay DW-3 & DW-6 – Dimensions and Capacities

Container Storage Warehouse Bay DW-3 & DW-6 (Formerly Bay #1)	Dimensions And Capacities
Overall Interior Dimensions Floor Area	54 Feet x 34 Feet 1,836 Square Feet
PCB Storage Area Dimensions Floor Area	18 Feet x 12 Feet (Two Areas) 432 Square Feet
Containment Berm Height	6 Inches
Contained Storage Area Trench and Sump Area	1,638 Square Feet 7 Square Feet
Gross Containment Volume Trench and Sump Area	6,126 Gallons 105 Gallons
Design Storage Capacity – PCB Design Storage Capacity – RCRA Maximum Liquid Volume – PCB Maximum Liquid Volume - RCRA	144 x 55-Gal Containers 240 x 55-Gal Containers 7,920 Gallons 13,200 Gallons
Required Containment Volume PCB Requirements at 25% RCRA Requirements at 10% Total Requirements	1,980 Gallons 1,320 Gallons 3,300 Gallons
Net Containment Volume ⁴	5,423 Gallons

⁴ -Net available area and volume after correction for containers and berm displacements. Trench and sump area is included.

4.2 **Disposal of PCB Waste Inventory**

As specified in 40 CFR 761.65, the PCB Closure Plan is based on the disposal of the maximum PCB storage capacity of the facility. This section will describe the maximum storage capacity of various types of PCB items and the disposal methods for the different types of PCB items.

4.2.1 **Maximum Inventory**

The maximum inventory in storage is indicated below.

Table 4-23: Maximum Inventory

Waste Type	Estimated Maximum Quantity
Liquids in Drums	8,745 Gallons
Pallets	22

4.2.2 **Disposal of Inventory**

Disposal of all PCB items will follow the guidelines set forth in 40 CFR 761.60. The maximum volume of waste as described in Section 4.2.1 will be disposed. Methods of disposal and processing procedures required for closure are discussed below. The designated PCB waste disposal facility is Clean Harbors Aragonite, LLC located in Aragonite, Utah. The secondary facility is Veolia Environmental Services, Inc. located in Port Arthur, Texas.

PCB liquids in drums will be transported off-site to an approved incineration facility and pallets used for transportation purposes will become the responsibility of the disposal company and is so reflected in the closure cost estimate

4.3 **PCB Closure Plan Sampling, Decontamination, and Spill Cleanup Policy**

A detailed description of the activities that will be carried out to identify and remove a decontaminate PCB contaminated containment system components is provided in this subsection. Specific items to be addressed are:

- Area Classifications
- Numerical Cleanup Levels
- Statistical Sampling Program
- Decontamination Procedures

- Post Cleanup Verification Procedures

4.3.1 Area Classifications

In order to establish appropriate cleanup levels for closure of this facility, it is necessary to classify all the building components within the PCB storage area according to their current level of use, future access, possible exposure, and type of material construction.

~~Containment Bay E and~~ Container Storage Warehouse Bays DW-3 and DW-4 can be classified as “Other Restricted Access Locations (Non-Substation)” according to 40 CFR 761.123. The classification is justified because all areas that could potentially be contaminated are enclosed within secure buildings, on a site surrounded by a security fence, and located greater than 0.1 kilometers from any nearby residential or commercial areas.

According to 40 CFR 761.125(c)(3), “Requirements for Decontaminating Spills in Other Restricted Access Areas”, there are five cleanup categories. Since there are no outdoor surfaces or soils exposed to PCBs at this facility, category (iv) and (v) are not applicable. The three applicable categories are (i) High-Contact, solid surfaces; (ii) Low-Contact Indoor, Impervious Solid Surfaces; and (iii) Low Contact, Indoor Non-Impervious Solid Surfaces. This subsection will discuss the classification of the following items:

- Facility Structure Components
- Containment System

4.3.1.1 Facility Structure Components

As mentioned previously, the PCB storage areas consists of a totally enclosed steel building placed within a concrete containment area and a concrete containment area inside a concrete block building. The concrete surfaces have been treated with an epoxy coating; therefore, they can be classified as “low contact indoor, impervious solid surfaces,” according to 40 CFR 761.123. Interior walls and doors below 6 feet can be classified as “high contact solid surfaces” according to 40 CFR 761.123. Interior walls above 6 feet will not be sampled, because there are no splash hazards at this facility, and PCBs do not readily volatilize, thus there is no reason to expect that PCBs will be present above 6 feet.

4.3.1.2 Containment System

The containment system at this facility consists of concrete berms and slabs. The concrete berms and slabs can be classified as “low contact indoor impervious solid surfaces” according to 40 CFR 761.123.

4.3.2 Numerical Standards

In the previous subsection, the various building components at the CHLA facility that performed PCB service were classified according to the criteria in 40 CFR 761.125(c)(3). Table 4-1 describes the various building component classifications and the corresponding cleanup level specified in 40 CFR 761.125(c)(3).

Table 4-34: Component Classifications and Specified Cleanup Levels

Cleanup Category Per 40 CFR 761.125 (c)(3) and 761.79	Building Components in this Category	Cleanup Criteria
High Contact Solid Surfaces	Interior Doors and Walls	10µg/100 cm ² below 6 feet
Low Contact Indoor, Impervious Solid Surfaces	Concrete Floor Containment Berms	10µg/100 cm ²

4.3.3 Statistical Sampling Program

A statistical sampling program will be initiated as part of the closure of this facility in order to ensure that the facility will be properly decontaminated upon closure. Specific topics to be addressed in the statistical sampling program are:

- Safety Plan
- Initial Facility Inspection
- Field Sampling Plan.

4.3.3.1 Safety Plan

According to 40 CFR 1910.120(b), a site specific safety plan shall be prepared for all work to be performed at a site that has the potential for employee exposure to a hazardous or toxic substance. Since employee exposure to such substances is possible during PCB closure activities at this facility, a safety plan conforming to the requirements set forth in 40 CFR 1910.120 (b), shall be prepared for the PCB closure activities at ~~ETCH~~LA at the time of closure. This safety plan will be prepared by the contractors at the time of closure and will be contractor specific.

A safety plan conforming to the requirements set forth in 40 CFR 1910.120(b) has been prepared for PCB activities occurring at this site currently and is available in Appendix E.

4.3.3.2 Initial Facility Inspection

The purpose of the Initial Facility Inspection is to gather data that will assist in deciding where to collect samples from, and to provide an overall assessment of

the site. This will include locating areas of potential PCB contamination, identifying any potential hazards or items causing a safety concern, and assessing the overall structural integrity of the facility. The following areas will be addressed when performing the Initial Facility Inspection:

- Review of Plant and Regulatory Agency Records
- Interviews with Site Personnel
- Visual Site Inspection.

Review of Plant and Regulatory Agency Records

The purpose for reviewing plant and regulatory agency records will be to gather any data that may exist concerning previous PCB spills, accident, or clean up actions. Plant records will be reviewed first, followed by regulatory agency records.

Interviews with Site Personnel

Available employees of the current owner, and any employees of previous owners that can be readily located, will be interviewed as part of the Initial Facility Inspection. The purpose of the interviews will be to determine if any PCB spills occurred at the facility that were not reported, or that may have occurred in a location that was outside the normal operating areas.

Visual Site Inspection

The Visual Site Inspection will involve a survey of the PCB storage area, including the immediately adjacent roads and surrounding land. The area where PCBs were stored will be entered and will be observed for any obvious spills, any building materials that might require special sampling, and any apparent structural defects or potential hazards.

4.3.3.3 Field Sampling Plan

This Field Sampling Plan presents a description of the activities planned for the pre-cleanup sampling at ~~ETCH~~LA. The sampling plan includes the following items.

- Field Investigation Objectives
- Sampling Locations and Rationale
- Decontamination Procedures
- Sample Handling and Documentation
- QA/QC Procedures

Field Investigation Objectives

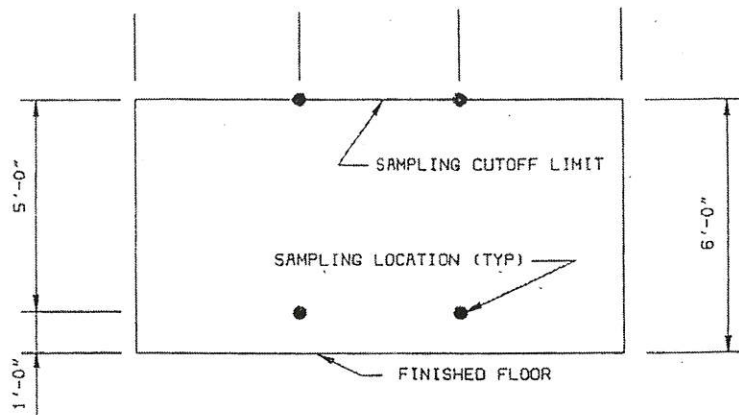
The overall objective of the Field Investigation is to determine if there is PCB contamination at the PCB storage facility in order to develop a cleanup plan so the PCB storage area can be effectively remediated and closed.

Sampling Locations and Rationale

As was mentioned in Section 4.3.1 Area classifications, all PCB storage will be conducted indoors, in an area surrounded with containment berms. For this reason, unless the Initial Facility Inspection reveals any potential PCB spill areas outside of the area identified in Section 4.3.1, no soil or groundwater samples will be collected during the Field Investigation. Sampling will be performed, however, in the bay described in Section 4.3.1. In each location, two sampling methodologies will be used: judgmental and systematic sampling.

Judgmental sampling will involve collecting samples in places where the Initial Facility Inspection found evidence of a release, or where use patterns indicate the possibility of PCB contamination. A minimum of one judgmental sample will be collected from the concrete of each containment area and will be collected from a low point or sump.

Systematic sampling will be performed on each wall and floor area. This will involve establishing a grid system for each wall and floor area, and collecting samples at the nodes. Typical sampling grids for walls are shown on Figure 4-2 and floor sampling grids for ~~Containment Bay E and the Container Storage Warehouse~~ ~~is are~~ shown on Figure 4-3 ~~and Figure 4-4, respectively~~. Sampling grids will be laid out in the field and sample locations will be marked with masking tape or other suitable marking device.



X = Interior perimeter of the fiberglass storage enclosure.

$L = X/8$; For $X = 60$ ft, $L = 7.5$ ft.

Begin at an arbitrary point on the interior wall and lay out grid points every 7.5 ft horizontally around the interior perimeter of the room. Locate sample points at 1 ft and 6 ft above finished floor at each grid point.

Figure 4-2: Typical Sampling Grid for Wall

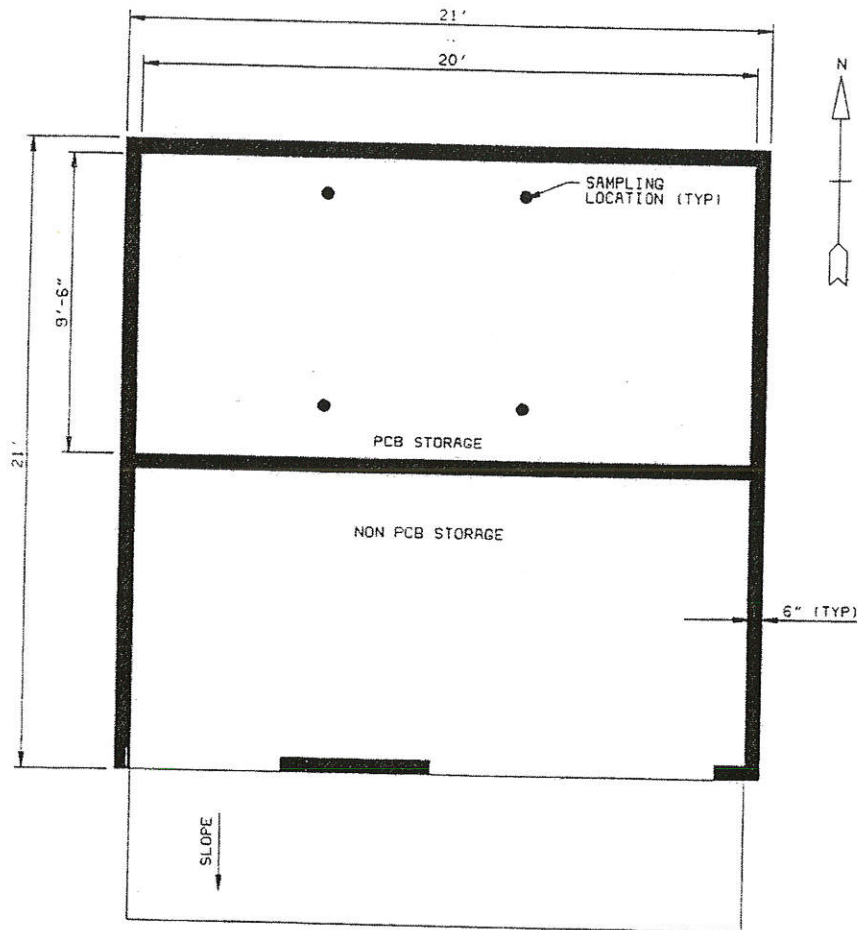


Figure 4-3: Grid Sampling Locations—Bay E

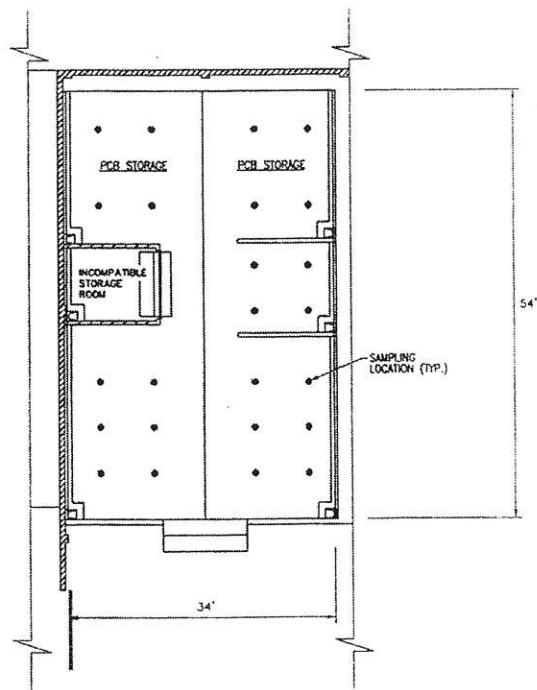


Figure 4-34: Grid Sampling Locations – Container Storage Warehouse

Sampling Activities and Analytical Requirements

All samples collected from surfaces of various building components will be surface wipe samples. Since all surfaces to be sampled are indoors and consist of impervious solid surfaces or non-impervious solid surfaces treated to make the surface resistant to PCB infiltration.

The Standard Wipe Test as specified in 40 CFR 761.123 will be performed for wipe samples.

All samples collected will be analyzed using EPA SW-846 Method 8082 or the current equivalent method.

Prior to collecting the pre-cleanup samples, individual sampling grid maps will be prepared for each wall and floor. The maps for the walls will be drawn on an 8 ½ x 11 sheet of paper and will depict all necessary dimensions and sampling locations needed to lay out the sampling grid. These maps will also be used as part of the sample documentation. The maps for the floors shall use those shown in Figure 4-3 and Figure 4-4.

Decontamination Procedures

All sampling equipment that is not disposable shall be decontaminated after each sample by washing twice with hexane and allowing to air dry. Sampling equipment may also be appropriately packaged and disposed. Personnel decontamination is addressed in the Site Safety Plan.

Sample Handling and Documentation

Proper handling and documentation of samples is important to assure that the data will be legally defensible and reproducible. To implement this, each sample will be assigned a unique sample identification number.

A jar label as shown in Figure 4-45 will be completed and placed on each sample jar. The lid will then be taped shut and custody seal as shown in Figure 4-45 will be placed around the lid. Each jar will be individually wrapped in bubble wrap plastic and placed in a cooler. The cooler shall be lined with Styrofoam packing material to protect the samples. Enough room will be left in the coolers to allow ice packs to be placed in the cooler to preserve the samples at or near 4 degrees C. Once a cooler is full, a Chain-of-Custody form as shown in Figure 4-56 will be completed in triplicate. The Chain-of-Custody will assure samples are always under the supervision of a qualified individual or organization. One copy of the Chain-of-Custody will be retained and the other two copies will be sealed in the cooler with the samples. The cooler will then be taped shut using strapping tape and sealed on three sides with custody seals.

Official Sample Seal	SAMPLE NO.	DATE	16 15 14 13 12 11 10 9 8 7 6 5 4 3 2 1
	SIGNATURE		
	PRINT NAME AND TITLE		

Sample #:	_____	Date:	_____
Collected By:	_____	Time:	_____
Analysis:	_____		
Preservative:	None <input type="checkbox"/> HNO ₃ <input type="checkbox"/> H ₂ SO ₄ <input type="checkbox"/> NaOH		
Other:	_____		

Figure 4-45: Jar Label and Sample Seal

4.3.3.4 QA/QC Procedures

To ensure all sampling and measurement efforts are documented and implemented with precision, accuracy, completeness, representativeness, and comparability, QA/QC procedures will be established as presented herein. Items that will be addressed in these QA/QC Procedures include detection limits, QC samples, data validation, laboratory QC procedures and performance and system audits.

Detection Limits

In order to determine whether a sample is contaminated above the levels specified in 40 CFR 761.125 (c)(3) it will be necessary for the laboratory to detect PCBs at levels below the specified cleanup levels. As described in Table 4-4, the cleanup level for exposed surfaces of this facility is 10µg/100 cm². Therefore, it will be necessary for the laboratory to detect PCBs at concentrations in the range of 1 µg/100 cm².

QC Samples

As part of the QC process, various types of quality control samples will be generated both in the field and in the laboratory. QC samples to be generated are field blanks, field duplicates, laboratory replicates, and spiked samples.

Field blanks are analyzed to demonstrate that the sample collection equipment has not been contaminated. Two field blanks will be prepared. One field blank will be prepared by rinsing the sampling template with hexane and collecting the rinsate in an 8-ounce wide mouth glass jar with Teflon lined screw cap. This sample will be sent to the laboratory and analyzed for PCBs. The other field blank will be prepared by sending an unused, unopened hexane saturated filter cloth to the laboratory for analysis.

Since the filter cloths are to be provided already saturated with hexane in individual jars, no preparation will be required for this sample other than assigning a sample identification number to it.

Field duplicates are used to help determine the precision of the sample collection activity. One field duplicate will be prepared. A duplicate surface wipe sample will be collected from an area as close as possible to the original sample. The same procedures will be used to collect the duplicate samples as are used in collecting the original samples. As is the case with all other samples, duplicates will be assigned unique sample identification numbers and shipped to the laboratory with the other samples.

Laboratory replicates are intended to check the precision of the analytical procedure. One sample from each batch of 20 or fewer will be analyzed in triplicate. The sample is divided into three replicate sub-samples. Each sub-sample shall be analyzed with the same analytical procedure, blind to the analyst.

The results of these analyses must be within the limits required for spiked samples.

Spiked samples are used to evaluate the sensitivity and reproducibility of the analytical method. This can be accomplished by analyzing blanks spiked with concentration of PCBs near the detection limit. To demonstrate the ability of the method to reproducibly detect the spiked sample, one spiked sample will be analyzed in triplicate for each group of 20 or fewer samples within each sample type collected. The laboratory will be responsible for preparing and analyzing all spike samples. Quantitative techniques must detect the spike level within plus or minus 30% for all spiked samples.

Data Validation

Once the analytical data is received back from the laboratory, it must go through a validation process to assure the data is useful. The validation process involves reviewing the data for the QC samples to determine whether or not the data falls within the acceptable guidelines discussed below, performing a statistical analysis on certain portions of the data, and reducing the data into a usable form.

Precision of the sample collection activity can be measured by comparing analytical results of samples and duplicate samples. The variation in the results is a measure of precision. Precision can be expressed as the relative percent difference (RPD), which is expressed as follows:

$$RPD = [D_1 - D_2] / ([D_1 + D_2] / 2) \times 100$$

Where,

RPD = Relative Percent Difference

D₁ = First Duplicate Value (Percent Recovery).

D₂ = Second Duplicate Value (Percent Recovery).

There are no specific review criteria for field duplicate analyses comparability. However, samples with large RPDs will be examined more carefully in the other validation criteria.

Accuracy of chemical test results are assessed by evaluating spiked samples. In order for data to be considered valid, the quantitative techniques must detect the spike level within plus or minus 30%. All analytical data will be reviewed against this criteria. Samples that do not meet this requirement will be flagged as invalid and will not be used.

Field blanks are used to determine if sampling equipment is causing contamination. Results from the analyses of the field blanks will be examined to see if any contamination was found.

Laboratory replicate samples are another way to measure the accuracy of the analytical method. The relative percent differences between the replicates and the original sample will be calculated using the equation on the previous page. If the RPD for any sample is not within plus or minus 30%, then the associated data will be rendered invalid.

In order to determine if a particular area is truly below the desired cleanup level, the upper one-sided percent confidence limit will be determined for each unique area (i.e. each wall, floor, or other area where multiple samples were collected). In order to determine the upper one-sided percent confidence limit, the mean and standard deviation of the samples must be calculated. The formulas for these calculations are shown below:

Upper One Sided Confidence Limit:

$$\mu_{\alpha} = \bar{x} + (t_{(1-\alpha), df}) \frac{s}{\sqrt{n}}$$

$$\text{where : } \bar{x} = \text{mean} = \frac{\sum_{i=1}^n x_i}{n}$$

Where $t_{(1-\alpha), df}$ is a physical constant, which can be obtained from Table 4-12.

$$S = \text{Standard Deviation} = \sqrt{\frac{\sum_{i=1}^n x_i^2 - \frac{\left(\sum_{i=1}^n x_i\right)^2}{n}}{n - 1}}$$

Where n = number of samples in the area being considered.

The mean of the sampling data is an estimate of the mean contamination of the entire sample area, but does not convey information regarding the reliability of the estimate. Through the use of a "Percent Confidence Limit", it is possible to provide a range of values within which the true mean is located. For this project, the desired percent confidence limit will be 95%, which means that in Table 4-45 will be 0.05.

Table 4-45: Values of Tau for Selected Alpha and Degrees of Freedom

Use alpha to determine which column to use based on the desired parameter, $t_{1-\alpha,df}$ or $t_{1-\alpha/2,df}$. Use the degrees of freedom to determine which row to use. The t value will be found at the intersection of the row and column. For values of degrees of freedom not in the table, interpolate between those values provided.

		α for determining $t_{1-\alpha,df}$							
		.25	.10	.05	.025	.01	.005	.0025	.001
		α for determining $t_{1-\alpha/2,df}$							
		.50	.20	.10	.05	.02	.01	.005	.002
Degrees of Freedom	df								
1	1	1.000	3.078	6.314	12.706	31.821	63.657	127.321	318.309
2	2	0.816	1.886	2.920	4.303	6.965	9.925	14.089	22.327
3	3	0.765	1.638	2.353	3.182	4.541	5.841	7.453	10.215
4	4	0.741	1.533	2.132	2.776	3.747	4.604	5.598	7.173
5	5	0.727	1.476	2.015	2.571	3.365	4.032	4.773	5.893
6	6	0.718	1.440	1.943	2.447	3.143	3.707	4.317	5.208
7	7	0.711	1.415	1.895	2.365	2.998	3.499	4.029	4.785
8	8	0.706	1.397	1.860	2.306	2.896	3.355	3.833	4.501
9	9	0.703	1.383	1.833	2.262	2.821	3.250	3.690	4.297
10	10	0.700	1.372	1.812	2.228	2.764	3.169	3.581	4.144
11	11	0.697	1.363	1.796	2.201	2.718	3.106	3.497	4.025
12	12	0.695	1.356	1.782	2.179	2.681	3.055	3.428	3.930
13	13	0.694	1.350	1.771	2.160	2.650	3.012	3.372	3.852
14	14	0.692	1.345	1.761	2.145	2.624	2.977	3.326	3.787
15	15	0.691	1.341	1.753	2.131	2.602	2.947	3.286	3.733
16	16	0.690	1.337	1.746	2.120	2.583	2.921	3.252	3.686
17	17	0.689	1.333	1.740	2.110	2.567	2.898	3.222	3.646
18	18	0.688	1.330	1.734	2.101	2.552	2.878	3.197	3.610
19	19	0.688	1.328	1.729	2.093	2.539	2.861	3.174	3.579
20	20	0.687	1.325	1.725	2.086	2.528	2.845	3.153	3.552
21	21	0.686	1.323	1.721	2.080	2.518	2.831	3.135	3.527
22	22	0.686	1.321	1.717	2.074	2.508	2.819	3.119	3.505
23	23	0.685	1.319	1.714	2.069	2.500	2.807	3.104	3.485
24	24	0.685	1.318	1.711	2.064	2.492	2.797	3.091	3.467
25	25	0.684	1.316	1.708	2.060	2.485	2.787	3.078	3.450
26	26	0.684	1.315	1.706	2.056	2.479	2.779	3.067	3.435
27	27	0.684	1.314	1.703	2.052	2.473	2.771	3.057	3.421
28	28	0.683	1.313	1.701	2.048	2.467	2.763	3.047	3.408
29	29	0.683	1.311	1.699	2.045	2.462	2.756	3.038	3.396
30	30	0.683	1.310	1.697	2.042	2.457	2.750	3.030	3.385
40	40	0.681	1.303	1.684	2.021	2.423	2.704	2.971	3.307
60	60	0.679	1.296	1.671	2.000	2.390	2.660	2.915	3.232
120	120	0.677	1.289	1.658	1.980	2.358	2.617	2.860	3.160
400	400	0.675	1.284	1.649	1.966	2.336	2.588	2.823	3.111
infinite		0.674	1.282	1.645	1.960	2.326	2.576	2.807	3.090

If $\mu_{ua} < \text{Cleanup Standard}$, the area will be considered clean and no cleanup will be performed on the particular area.

If $\mu_{ua} \geq \text{Cleanup Standard}$, the area will be considered contaminated and cleanup of the area will be required.

The final aspect of data validation will be reducing the data into a usable form. Once all the data is received from the laboratory and has been validated according to the criteria mentioned previously, the data will be organized and put into tables. Outliers will be flagged and examined further for tendencies or patterns in relationship to the other data. If no tendencies or patterns are apparent after further review, the outliers will be thrown out. Outliers that are judged by the reviewer to be legitimate will be kept.

Laboratory QC Procedures

The laboratory selected to perform the analyses will be a current participant in the U.S. EPA Contract Laboratory Program (CLP) or follow a similar documented QA/QC program. Since the required analysis is not standard CLP protocol, the laboratory will follow method specific protocol and QA/QC procedures both in analyzing the samples and reporting the data.

4.3.4 Decontamination

After all the data has been validated, and the areas of PCB contamination above cleanup levels have been identified, cleanup of these areas can be initiated. As part of this PCB closure plan, different cleanup methods are listed and appropriate methods will be selected for the various items to be decontaminated. Areas that will potentially need to be decontaminated may include facility structure components and containment systems. Items to be discussed in this section include:

- Evaluation of Cleanup Methods.
- Description of Selected Cleanup Methods
- Decontamination of Cleanup Equipment
- Health and Safety Considerations
- Disposal of Cleanup Derived Waste

4.3.4.1 Evaluation of Cleanup Methods

Currently, there are several methods in use for cleanup of PCBs. These include the solvent clean method and various proprietary aqueous solvent or foam methods. Due to the small size of the potential area for decontamination, this PCB closure plan will focus only on the solvent clean method.

Solvent Clean Method.

This method can be used to decontaminate both exposed surfaces and PCB containers as specified in 40 CFR 761.79. Acceptable solvents include, but are not limited to, isopropyl alcohol, kerosene, hexane and #2 diesel fuel. For exposed surfaces, sufficient volume of solvent is applied to cover the entire contaminated surface, the excess solvent is absorbed with rags, and the contaminated area is wiped with a clean rag. If the surface is porous, scrubbing may be required using a wire brush. The process is then repeated and all solvent is absorbed with rags and granular absorbent.

The Solvent Clean Method is the most common cleanup method for PCBs. This method has been proven to be effective on most types of materials. It does not work as well on porous surfaces because the solvent tends to increase the mobility of the PCBs and allow them to penetrate further into the porous surface.

Equipment and support facilities needed for the solvent clean method are minimal. The only equipment needed is: rags, solvents, wire brushes, buckets, pumps, and other small items. Ladders and scaffolding may be required depending on the height of the area or item being decontaminated.

The solvent clean method is a simple procedure to implement and should not require any special time requirements. Since this method involves the use of flammable solvents, special precautions would need to be taken to prevent ignition of the solvents.

The relative cost of the Solvent Clean Method is expected to be low. As mentioned previously, this method does not involve any sophisticated equipment, so the main costs will be for labor, solvent, rags, and other miscellaneous equipment.

Health and Safety Considerations

The Health and Safety considerations during the cleanup of the facility are addressed in Appendix C and Appendix E.

Disposal of Cleanup Derived Waste

Waste material generated during the PCB closure activities will fall into the two categories of contaminated and non-contaminated. Contaminated material will include liquid waste from the solvent clean process, miscellaneous sampling equipment, personnel protective equipment, and other items. These items will be segregated into liquids and solids and stored in 55-gallon drums. Both liquids and solids will be transported to an approved disposal facility.

Non-contaminated material generated during closure activities will be disposed of at the local sanitary landfill.

4.3.5 Post Cleanup Verification Procedures

In order to verify that cleanup has been effective in reducing PCB contamination below acceptable levels and to satisfy the requirements of 40 CFR 761.125 (c)(5)(iii), post cleanup sampling will be performed as described below. Specific items to be addressed in this section include sampling methods, locations and rationale, analytical procedures, and waste collection.

4.3.5.1 Sampling Methods, Locations, and Rationale

The methods used for post cleanup sampling will be the same as those used for the pre-cleanup sampling. This will consist of wipe samples using a hexane saturated gauze pad of known size to wipe down an area of 100 cm². The gauze pad is then placed in a glass jar and sealed.

The locations to be sampled during post cleanup sampling will be based on areas of contamination identified during the initial site inspection and the pre-cleanup sampling. Before any post cleanup sampling begins, the records from the previous sampling will be reviewed to identify areas where elevated levels of PCBs were found. At the locations, wipe samples will be taken as close as possible to the location previously having elevated levels of PCBs.

4.3.5.2 Analytical Procedures

Samples collected during post cleanup sampling will be analyzed using the same analytical methods described in the pre-cleanup analytical procedures. After the results are returned and validated as described previously, any sampling locations with PCB concentrations above the established cleanup levels will be decontaminated again using the same procedures as previously specified.

4.3.5.3 Waste Collection

All waste generated during the post cleanup sampling will be collected, containerized, and disposed in accordance with all Federal, State, and Local regulations..

4.4 Other Closure Activities

Because of the way the facility is laid out, other closure activities such as groundwater monitoring, run-on/run-off treatment and control, and additional security devices will not be necessary after cleanup is completed.

4.5 Closure Schedule

Closure activities for the ~~ETCH~~LA facility will be subject to the schedule described in Table 4-~~56~~. The estimated date of closure will be March 1, 2065.

Table 4-~~56~~: Closure Activity Schedule

Date	Closure Activity Schedule	Duration	
		Days	Hours
Dec. 31, 2064	Owner to notify EPA of intent to close facility.	0	0
Jan. 31, 2065	Facility to receive final shipment of PCB waste.	0	0
Mar. 1, 2065	Closure of facility begins.	0	0
	Removal of inventory (Section 4.2.2).	1	8
	Initial facility inspection (Section 4.3.3.2).	2	4
	Facility sampling (Section 4.3.3.3).	1	4
	Receive analytical results and perform validation and statistical analyses (Section 4.3.3.3).	30	4
	Decontaminate facility (Section 4.3.4).	5	14
	Submit closure certification to U.S. EPA.	30	8

A timeline showing the required activities before and after closure is presented in Figure 4-6. The times indicated are illustrative and actual duration of each task is expected to be much less.

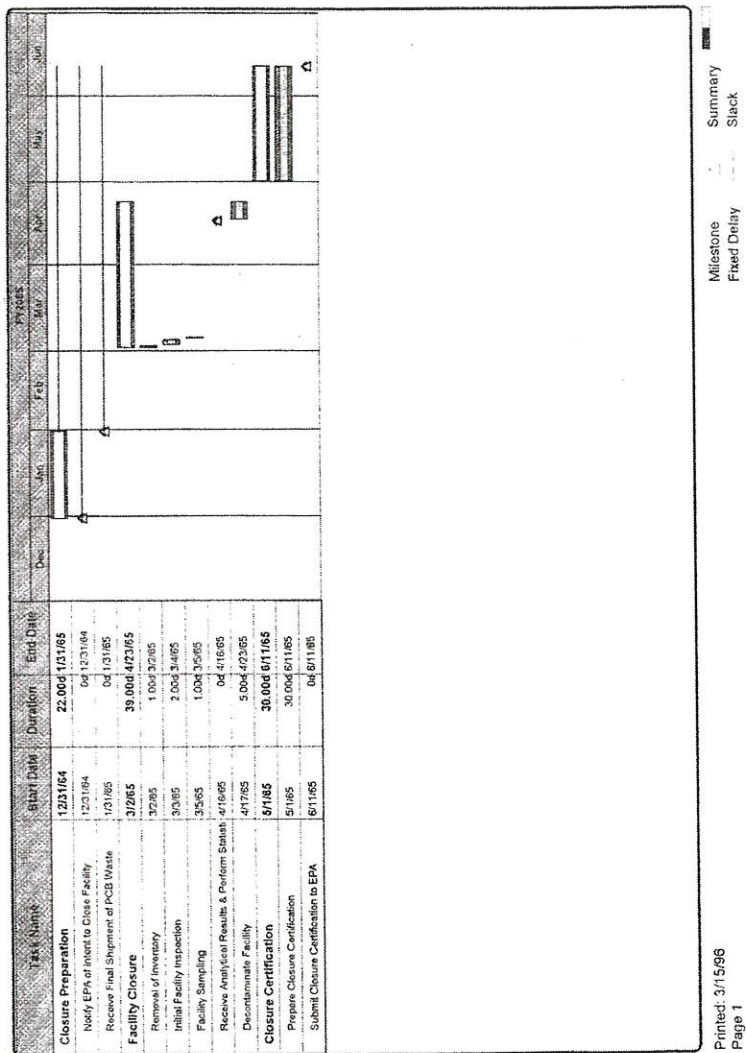


Figure 4-6 TSCA Closure Schedule

4.6 Modifications to the PCB Closure Plan

This PCB Closure Plan will be amended and resubmitted to the U.S. Environmental Protection Agency for approval when certain specified events or conditions occur. These items are listed below.

4.6.1 Operating and /or Design Changes

When a change in operating plans or in facility design affect the PCB Closure Plan, an amended plan will be prepared and submitted to the U.S. EPA for approval. Examples of specific items, which are considered under this subsection, include:

- Increases in facility size or capacity.
- Increases in the estimate of maximum inventory.
- Changes in the regulatory requirements that affect closure activities.
- Changes in the surrounding land use.

4.6.2 Unexpected Events During Final Closure

If during final closure, unexpected events occur which could affect the existing PCB Closure Plan; an amended PCB Closure Plan will be prepared and submitted to the U.S. EPA for approval. Unexpected events would include a release during closure activities, unavailability of planned disposal facilities or other occurrences, which were not anticipated.

4.6.3 Change in Expected Year of Closure

The year 2065 was selected as the closure year for this Plan. If closure is expected to occur at a different time, an amended PCB Closure Plan will be prepared and submitted to the U.S. EPA for approval.

4.6.4 Change in Financial Status

If a change in the facility's financial status occurs which may result in the inability to adequately pay for closure, an amended PCB Closure Plan will be submitted to the U.S. EPA for approval.

4.7 Closure Plan Checklist

A closure plan checklist is attached on the following pages. The checklist is taken from the TSCA Guidance Manual for Commercial PCB Storage Facility Application dated October 18, 1989. Specific subsections of this PCB Closure Plan are identified on the checklist to aid in compliance review.

Exhibit 4-1: Closure Plan Checklist for Commercial PCB Storage Facilities

	<u>Provided</u>	<u>Not Applicable</u>	<u>Comments</u>
1.0 Facility Description:			
1.1 General Description:	4.1.1		
1.2 Jurisdiction in which facility is located:	4.1.2		
1.3 Written description as well as topographic map detailing information on:			
• PCB Storage facilities	4.1.3		
• PCB treatment and disposal facilities		X	
• Hazardous waste management units (if RCRA permitted also)	4.1.3		
• All buildings and structures	4.1.3		
• Any 100-year floodplain	4.1.3		
• Adjacent surface waters or wetlands	4.1.3		
• Surrounding land uses	4.1.3		
• Other key topographic features	4.1.3		
• Traffic patterns	4.1.3		
• Location and status of underground storage tanks		X	
• Location and nature of security systems	4.1.3		
• Closed PCB Units (or hazardous waste management units if RCRA permitted)		X	

1.4 Description of environmental conditions on-site:

• Proximity to surface waters including ponds, lagoons, wetlands and storage reservoirs	4.1.4		
• Proximity to public or private drinking water sources	4.1.4		
• Sewer location and design which could result in contamination of sewage treatment systems from PCB spills		X	
• Location of nearby grazing lands, farms, and vegetable gardens		X	
• Presence of a shallow well, ground water near the surface, or which poses a high potential for ground-water contamination	4.1.4		

1.5 Detailed description with engineering drawings of facility design:

	Design Capacity	Monitoring	Containment Systems
• Roof and walls	4.1.5		
• Flooring	4.1.5		
• Curbing and its containment volume	4.1.5		
• Drain valves, floor drain, etc.			
• Storage pallets outside of storage buildings (including locations and numbers)	4.1.5		
• Bulk tanks	N/A	N/A	N/A

2.0 Disposal of PCB Waste Inventory:

2.1 Maximum inventory:

	<u>Provided</u>	<u>Not Applicable</u>	<u>Comments</u>
• Provide design capacity	4.2.1		
• Estimate of maximum types and Quantities of:			
PCB Articles	4.2.1		
PCB Article Containers	4.2.1		
PCB Liquids in Bulk Tanks	4.2.1		
PCB Containers	4.2.1		
PCB Capacitors	4.2.1		
PCB Transformers	4.2.1		
PCB Contaminated Electrical Equipment	4.2.1		
Other PCBs	4.2.1		
Total PCB Inventory	4.2.1		

2.2 Disposal of inventory:

• Details to ensure compliance as a PCB waste generator	4.2.2		
• Estimate of maximum inventory to be sent off-site	4.2.2		
• Description of any treatment prior to transport, if applicable		X	
• Methods and arrangements used for PCB waste removal and transportation off-site to approved storage and disposal facilities	4.2.2		
• Description of treatment and disposal methods at the final treatment or disposal facilities	4.2.2		

- Bulk tank removal, transport, tracking,
and off-site disposal of tank capacity _____ X _____
- Proposed schedule to complete disposal
within 90 days from closure
commencement _____ 4.5 _____

3.0 Closure Plan Sampling, Decontamination, and Compliance with the Spill Cleanup Policy:

3.1 Identification and classification of items to be decontaminated:

	Use	Structures & Equipment Construction Materials	Spill Cleanup Policy Classification of Materials, Structures, and Equipment	Numerical Cleanup Levels Applicable from the Spill Cleanup Policy
• Facility structure components (roof, wall, etc.)	4.3.1			
• Surrounding soil, pavement and vegetation	N/A			
• Containment systems and piping	4.3.1			
• Equipment	N/A			
• Pallets	N/A			
• Bulk tanks	N/A			
• OTHER	N/A			

3.2 Pre-cleanup survey and sampling:

	Provided	Not Applicable	Comments
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a) Visual inspection to ascertain sampling boundaries includes detailed discussion of inspection for PCB contaminated residues or particulate matter on:

• Tanks		X	
• Valves and piping		X	
• Equipment		X	
• Containment areas	4.3.3		
• Soil		X	
• OTHER		X	

b) Sampling survey should include:

• Discussion of methods for soil and aqueous materials		X	
• Discussion and maps of proposed grid sampling	4.3.3		
• Sampling plan for solid surfaces	4.3.3		

• Sampling for the penetration and contamination of PCBs into solid surfaces		X	
• Discussion of validity of statistical sampling plan	4.3.3		
• QA/QC	4.3.3		

4.0 Decontamination:

4.1 Cleanup methods for each contaminated component should be described in detail:

	<u>Description of Decontamination Method</u>	<u>Description of Worker Protection Measures</u>
• Facility walls	4.3.4	
• Facility floors	4.3.4	
• Facility roof	4.3.4	
• Soil	N/A	
• Containment systems and valves	4.3.4	
• Equipment	N/A	
• Pallets	N/A	
• Bulk tanks	N/A	
• OTHER	N/A	

4.2 A description of the criteria used to choose each decontamination method for the components listed below:

	<u>Effective- ness</u>	<u>Equip- ment</u>	<u>Support Facilities Needed</u>	<u>Time Require- ments</u>	<u>Safety Require- ments</u>	<u>Amounts of Wastes Generated</u>
• Facility walls	4.3.4					
• Facility floors	4.3.4					
• Facility roof	4.3.4					
• Soil	N/A					
• Containment systems and valves	4.3.4					
• Equipment	N/A					
• Pallets	N/A					
• Bulk tanks	N/A					
• OTHER	N/A					

4.3 Decontamination should also detail post-cleanup verification sampling – especially visually contaminated areas:

<u>Provided</u>	<u>Not</u> <u>Applicable</u>	<u>Comments .</u>
<u>4.3.4</u>		

4.4 Decontamination, containerization, and disposal of both PCB and non-PCB wastes produced in facility decontamination, including solvents, rags and equipment:

• Estimates of wastes produced from:		X	
➤ Decontamination of equipment	4.3.5		
➤ Decontamination of structures		X	
➤ Decontamination of grounds	4.3.5		
➤ Post cleanup verification	4.3.5		
• Estimates of transportation of above wastes	4.3.5		
• Estimates of disposal facilities that would take these wastes	4.2.2		

5.0 Other Activities Covered in the Closure Plan:

5.1 Ground-water monitoring plan: 4.4

5.2 Treatment, removal, and disposal of run-on and run-off to decontamination procedures: 4.4

5.3 Security measures to prevent unintentional or unpermitted access to the site: 4.4

6.0 Schedule for Closure Detailing the Above Activities: 4.5

5	CLOSURE COST ESTIMATE	2
5.1	INITIAL CLOSURE COST ESTIMATE.....	2
5.1.1	Certification.....	2
5.1.2	Closure Activities Included.....	2
5.1.3	Cost Basis.....	2
5.1.4	Inventory on Hand.....	2
5.1.5	Off-site Disposal.....	2
5.1.6	Third Party Participation.....	3
5.1.7	Salvage Value.....	3
5.2	REVIEW OF COST ESTIMATE ADJUSTMENTS	3
5.2.1	Adjustments for Closure Plan Modifications.....	3
5.2.2	Annual Inflation Adjustments.....	4

5 CLOSURE COST ESTIMATE

5.1 Initial Closure Cost Estimate

The closure of the ~~Emerald Transformer~~~~Clean Harbors~~ Los Angeles, LLC PCB storage facility is described in Section 4- PCB Closure Plan. The date of closure has arbitrarily been set for March 1, 2065. This date has been selected solely to develop a closure plan, and may be revised in the future based on business decisions.

The estimated cost for the PCB storage area closure based on 2010 dollars is listed in Table 5-3. Tables 5-1 and 5-2 illustrate the costs by separate areas. The basis of the various costs is summarized below.

5.1.1 Certification

The closure cost has been certified by the person responsible for the closure cost preparation and uses the prescribed working. This certification is located in Section 6.

5.1.2 Closure Activities Included

The closure cost estimate is intended to cover all the activities described in the PCB Closure Plan. Specific activities are listed in Tables 5-1 and 5-2 along with the estimated cost to complete each activity.

5.1.3 Cost Basis

The costs presented have been calculated by utilizing current cost quotations for outside vendors, contractors, and service agencies. Labor rates include provisions for contractor overhead and profit, and are based on the use of third party cleanup contractors. Costs include the certification of closure by an independent, professional engineer. Disposal rates are those currently charged by the disposal sites listed in the PCB Closure Plan. The costs include a factored transportation rate based upon a full load trip rate of \$3.00 per loaded mile. Costs also include a 10% contingency.

5.1.4 Inventory on Hand

The closure cost estimate is based on the inventory specified in the PCB Closure Plan. This inventory consists of the maximum possible inventory of ~~78,920~~~~745~~ gallons of PCB waste.

5.1.5 Off-site Disposal

All disposal of existing inventory and closure derived waste is intended to be at an approved off-site disposal facility. No on-site treatment or disposal is proposed.

5.1.6 Third Party Participation

PCB storage area closure costs, including disposal of inventory and closure derived wastes, are based on the use of third parties and do not include use of parent companies or subsidiaries of the owner/operator of the ~~Emerald Transformer~~~~Clean Harbors~~ Los Angeles, LLC facility.

5.1.7 Salvage Value

No credit has been taken for possible salvage value of any component of the facility or inventory.

5.2 Review of Cost Estimate Adjustments

Adjustments to the closure cost estimate are required in two situations:

- After certain modifications to the PCB Closure Plan
- Annually to account for inflation

5.2.1 Adjustments for Closure Plan Modifications

A revised closure cost estimate is required to be prepared within 30 days of approval by the Regional Administrator of a closure plan modification. The revised cost estimate will be requested by the U.S. EPA when notification of approval of a closure plan modification is made.

The following changes in facility conditions or activities could increase closure cost estimates:

- An increase in facility size or capacity
- An increase in the estimate of maximum inventory
- Changes in regulatory requirements affecting the cost of closure
- Contingencies over the facility life that may affect future closure costs
- Changes in surrounding land use that may affect closure activities

Changes in facility conditions may also be the basis for a reduction in the closure cost estimate. A request for a reduction may be made as long as the closure activities continue to meet regulatory requirements.

5.2.2 Annual Inflation Adjustments

Closure cost estimates must be adjusted annually to account for inflation. This adjustment must be made prior to the anniversary date of the financial assurance instrument.

Annual inflation adjustments to the closure cost estimate may be made by either recalculating the closure cost using the current year's costs, or by multiplying the previous estimate by an inflation factor that measures the general trend in prices in the economy.

Use of the inflation factor will require regulatory review of only the inflation factor calculation. Re-estimating the closure costs will require a level of review similar to an initial closure cost estimate.

The source for inflation factor data is based upon standard practices accepted by the U.S. Department of Commerce.

The inflation factor used in the revision of the closure cost estimate is obtained by dividing the most recent annual deflator by the previous year's deflator factor. The previous closure cost estimate is then multiplied by this quotient to derive the new closure cost estimate.

Table 5-1: Closure Costs—New Container Storage Pad—Bay E

NEW CONTAINER STORAGE PAD—BAY E	Quantity	Unit Cost	Total Cost
INVENTORY DISPOSAL			
Drums: Liquid/Solid	12,000 lbs.	\$0.45/lb.	\$5,400
INVENTORY DISPOSAL SUB-TOTAL			\$5,400
DECONTAMINATION (Floor Area=190 ft ² , Wall Area to 6 ft=354 ft ²)			
Records Review & Interviews—Manager	4 Hours	\$55/Hour	\$220
Inventory Removal			
Laborers	4 Hours	\$24/Hour	\$96
Foreman	4 Hours	\$32/Hour	\$128
Initial Sampling			
Laborers	4 Hours	\$24/Hour	\$96
Manager	4 Hours	\$55/Hour	\$220
Grid Samples (Note 1)	20 Each	\$45 Each	\$900
Discretionary Samples (Note 1)	2 Each	\$45 Each	\$90
QA/QC Samples	7 Each	\$45 Each	\$315
Surface Decontamination (Floor Area=190 ft ² +10% of Wall Area=36 ft ²)			
Cleaning Product (No. 2 Diesel)	35 Gallons	\$3.60/Gallon	\$126
Laborers	4 Hours	\$24/Hour	\$96
Foreman	4 Hours	\$32/Hour	\$128
Safety Manager	2 Hours	\$48/Hour	\$96
Liquid Waste—Diesel (Note 2)	0 Gallons	\$0/Gallon	\$0
Solid Waste	1 Drum	\$400	\$400
Confirmation Sampling			
Grid Samples (Note 1)	5 Each	\$45 Each	\$225
Discretionary Samples (Note 1)	1 Each	\$45 Each	\$45
QA/QC Samples (Note 1)	5 Each	\$45 Each	\$225
Laborers	2 Hours	\$24/Hour	\$48
Foreman	2 Hours	\$55/Hour	\$110
Certification—3 rd Party Engineer	4 Hours	\$95/Hour	\$380
Miscellaneous			
Expendable Supplies	1 Lot	\$300/Lot	\$300
Safety Equipment	4 Sets	\$50/Set	\$200
Project Management	8 Hours	\$55/Hour	\$440
Per Diem Expenses	2 Days	\$125/Day	\$250
Utilities	4 Days	\$10/Day	\$40
Rental Equipment	1 Lot	\$250/Lot	\$250
DECONTAMINATION SUB-TOTAL			\$5,424
NEW CONTAINER STORAGE PAD—PAD E TOTAL			\$10,824

Note 1—Sample cost includes sampling supplies.

Note 2—Diesel fuel cleaning agent is absorbed into solids (rags, brushes, etc.) and is disposed of as a solid.

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Table 5-12: Closure Costs – Container Storage Warehouse – PCB Area

CONTAINER STORAGE WAREHOUSE PCB AREA	Quantity	Unit Cost	Total Cost
INVENTORY DISPOSAL Drums: Liquid/Solid	115,200 lbs.	\$0.45/lb.	\$51,840
INVENTORY DISPOSAL SUB-TOTAL			\$51,840
DECONTAMINATION (Floor Area = 1,026 ft ² , Wall Area to 6 ft = 462 ft ²)			
Records Review & Interviews – Manager	4 Hours	\$55/Hour	\$220
Inventory Removal			
Laborers	36 Hours	\$24/Hour	\$864
Foreman	36 Hours	\$32/Hour	\$1,152
Initial Sampling			
Laborers	12 Hours	\$24/Hour	\$288
Manager	12 Hours	\$55/Hour	\$660
Grid Samples (Note 1)	50 Each	\$45 Each	\$2,250
Discretionary Samples (Note 1)	5 Each	\$45 Each	\$225
QA/QC Samples	18 Each	\$45 Each	\$810
Surface Decontamination (Floor Area=1,026 ft ² +10% of Wall Area=46ft ²)			
Cleaning Product (No. 2 Diesel)	165 Gallons	\$3.60/Gallon	\$594
Laborers	20 Hours	\$24/Hour	\$480
Foreman	20 Hours	\$32/Hour	\$640
Safety Manager	10 Hours	\$48/Hour	\$480
Liquid Waste – Diesel (Note 2)	0 Gallons	\$0 Gallon	\$0
Solid Waste	4 Drum	\$400	\$1,600
Confirmation Sampling			
Grid Samples (Note 1)	12 Each	\$45 Each	\$540
Discretionary Samples (Note 1)	3 Each	\$45 Each	\$135
QA/QC Samples (Note 1)	12 Each	\$45 Each	\$540
Laborers	5 Hours	\$24/Hour	\$120
Foreman	5 Hours	\$55/Hour	\$275
Certification – 3 rd Party Engineer	4 Hours	\$55/Hour	\$380
Miscellaneous			
Expendable Supplies	1 Lot	\$700/Lot	\$700
Safety Equipment	20 Sets	\$50/Set	\$1,000
Project Management	832 Hours	\$55/Hour	\$1,760
Per Diem Expenses	5 Days	\$125/Day	\$625
Utilities	20 Days	\$10/Day	\$200
Rental Equipment	1 Lot	\$250/Lot	\$1,000
DECONTAMINATION SUB-TOTAL			\$17,538
CONTAINER STORAGE WAREHOUSE-PCB AREA TOTAL			\$69,378

Note 1 – Sample cost includes sampling supplies.

Note 2 – Diesel fuel cleaning agent is absorbed into solids (rags, brushes, etc.) and is disposed of as a solid.

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Table 5-23: Closure Costs – Totaled

TASK	CONTAINER STORAGE WAREHOUSE	TOTAL
Inventory Disposal	\$51,840	\$517,824 0
Decontamination	\$17,538	\$1722,538 962
Contingency, 10%	\$6,938	\$68,938 0
Total Closure Cost	\$76,316	\$7688,316 222

6.0 PCB CLOSURE COST ESTIMATE CERTIFICATION2

6.0 PCB CLOSURE COST ESTIMATE CERTIFICATION

The following certification is made by the person responsible for preparation of the PCB Closure Cost Estimate presented in Tables 5-1 ~~and through 5-23~~.

Under the civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying this document is true, accurate, and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who, acting under my direct instructions, made the verification that this information is true, accurate, and complete.

Signature: _____

Printed Name: Joe L. Christopher~~Bonnie C. Martin~~

Date: October~~December 186, 20170~~

7. DEMONSTRATION OF FINANCIAL ASSURANCE 2

7. DEMONSTRATION OF FINANCIAL ASSURANCE

761.65 (d)(3)(x) specifies that a PCB storage application must include a demonstration of financial assurance for facility closure. This demonstration is provided in this section and Appendix C and Appendix D.

As previously discussed in this application, the overall ~~Emerald TransformerClean Harbors~~ Los Angeles, LLC facility has been issued a RCRA Part B permit. The RCRA permit includes a Closure Plan and Cost Estimate (included in Appendix C of this application) for the entire facility. The closure cost estimate for the entire facility as it exists today, is estimated to be \$1,189,457.

The Closure Plan for the PCB storage portion of the facility is contained in Section 4 of the application. The Cost Estimate is contained in Section 5. The estimated cost for closing the PCB storage portion of the facility is ~~\$76,31688,222~~.

Financial assurance to close the entire existing ~~Emerald TransformerClean Harbors~~ Los Angeles, LLC facility is provided by a ~~Surety BondCertificate of Insurance~~ for Closure and/or Post-Closure, ~~Policy # ENC 5254327-02~~ from ~~Lexon-Steadfast~~ Insurance Company in the amount of ~~\$4,500,000.003,792,471.53~~.

It should be noted that the cost to close the entire facility is not the sum of the cost to close the RCRA permitted area and the PCB permitted area, since:

- The cost to close the PCB storage area of the Container Storage Warehouse includes decontamination of the entire Bay's DW-3 and DW-6 (formerly Bay #1). The reason is that the entire bay serves as containment for the total volume of waste stored in that bay. Costs to decontaminate this area as a RCRA unit have been included in the RCRA Closure Cost Estimate. The effect of including the cleaning of this area twice on the Closure Cost Estimate was to add approximately \$10,000 of excess decontamination cost (for RCRA area decontamination).
- When calculating the maximum waste inventory for purposes of calculating the RCRA Closure Cost Estimate, Bay's DW-3 and DW-6 (formerly Bay #1) of the Container Storage Warehouse was assumed to be full of RCRA waste. Thus, the volume of drummed waste in the PCB storage areas of Bay DW-3 and DW-6 was counted twice, as RCRA waste and as PCBs. The effect of this "double counting" on the Closure Cost Estimate was to add approximately \$57,000 of excess disposal and transportation cost (for RCRA waste disposal).

When the effects of closing the PCB storage area in Bay DW-3 and DW-6 twice are considered, it is evident that the existing financial assurance of ~~\$4,500,000.00~~ ~~3,792,471.53~~ is sufficient to close the facility.

APPENDIX A

I. **PURPOSE**

This procedure is implemented for all PCB materials being received in order to actively comply with all facility permits and regulatory citations. Implementation of this procedure requires the imposition of mandatory procedures for generators and customers sending PCB material to this facility. This procedure is consistent with good corporate policy and operating discipline.

This procedure addresses pre-acceptance generator required actions, transportation required actions, acceptance related actions, storage related actions, outbound actions, disposal and record-keeping actions, and training requirements. Customer Service staff, material routers, operations personnel, and transporters utilized by the facility for shipping PCB packages will follow this procedure.

California regulated PCB's are not addressed with this Standard Operating Procedure. California regulated PCB's are 5-49 ppm in PCB concentration unless the material was originally derived from a TSCA regulated source, in which case it is TSCA regulated.

II. **RESPONSIBILITIES**

A. **Facility Manager**

The Facility Manager will ensure the requirements of this procedure are met continually. The Facility Manager shall be responsible for ensuring that all required training, inspections, and operational procedures are performed as required, and in accordance with this procedure. The Facility Manager is also responsible for monitoring compliance.

B. **Manager and Supervisor**

The Manager and Supervisor are responsible for training employees on this procedure to ensure good operating practices in compliance with all appropriate regulations. Managers and supervisors are responsible for documenting such training and providing appropriate competency testing and updates as necessary.

C. **Health and Safety Manager**

The Health and Safety Manager is responsible for assisting the determination of the proper Personal Protective Equipment that must be employed when handling PCB materials. The Health and Safety Manager is also responsible for assisting in the development of procedures necessary to safely handle materials listed by this procedure and developing and implementing training.

D. Environmental Manager

Then Environmental Manager is responsible for assisting development of good operating procedures that comply with all relevant permits and regulatory citations.

E. Employee

The employee is responsible for promptly reporting any deviation from this procedure or non-compliance situation which may develop. The employee is responsible for following all facility policies and procedures and using good judgment during implementation of this and other procedures.

III. PROCEDURES**A. Pre-Acceptance**

1. ~~Central-The facility Profile Group (CPG)~~ receives the PCB profile from the customer. Refer to the PCB Guidance Document in Appendix A for necessary information. The Date-Removed-From-Service is the same as the Out-of-Service-Date (OSD).
2. The Profile is entered into the company's waste tracking system if it has not been submitted electronically.
3. ~~The facility CPG~~ reviews the profile for completeness and accuracy. A PCB Continuation Sheet may be submitted with the profile. A PCB Continuation Sheet is attached as Appendix B.
4. Incomplete profiles or other documentation will be corrected by the ~~facility CPG~~ and returned to the customer. Reference the PCB Guidance Document which is attached at the end of this procedure for required information.
5. After the information is in place, the profile is approved.

B. Scheduling

1. The PCB load is scheduled once the profile is correct.

C. Receiving

1. Paperwork is reviewed upon load arrival and the following information is verified:
 - a) Weight manifested in kilograms (K).
 - b) Properly completed PCB Continuation Sheet with Generator Unique Identification Number, Emerald Transformer~~Clean Harbors~~ Profile Number, Type of PCB Item (Bulk Tanker or Truck, PCB Transformers, etc.), Description of Contents (Liquid, Soil, Debris, Other), Weight in kilograms (K), and Date-Removed-From-Service (Out-of-Service-Date).
 - c) All paperwork discrepancies are resolved within 15 days. Paperwork discrepancies include unapproved profiles, missing Generator Unique Identification Numbers on the paperwork, weight not properly manifested in kilograms, missing Out-of-Service-Dates, missing type of PCB item and description of contents.
2. The PCB materials are unloaded and normal unloading procedures apply except for the following regarding PCB containers.
 - a) Copies of manifest and continuation sheets shall be included with the normal receiving packet for piece count confirmation and QC by the receiving staff.
 - b) PCB Containers shall be visually inspected for non-conforming conditions, such as exterior contamination or visible residues, missing Generator Unique Identification Number, hazardous Waste Markings and PCB Markings not completed properly, missing Emergency Contact information, not recorded on the container, or any information not clearly visible.
 - c) Non-conforming information shall be listed on the QC Receiving Sheet and resolved as soon as possible.
 - d) Samples will not be taken from PCB containers without authorization from the Facility Manager, Operations Manager, Environmental Manager and/or the Health and Safety Manager.

D. Storage

1. Any pallets received loaded with PCB containers shall be considered contaminated and go with the PCB containers to the PCB storage area.
2. Access to the PCB storage area is limited to authorized employees. A warning sign shall be located near the entrance to the PCB area stating "Restricted Area – Increased PPE Level Required".
3. A chain and standards, constructed of material that can readily be decontaminated, disposed, and/or replaced, shall provide a physical entry barrier to the PCB storage area.
4. PCB Warning Placards shall be prominently displayed near the PCB storage area.
5. Emergency Contacts and evacuation routes shall be prominently displayed throughout the facility.
6. Personal protective equipment requirements for the warehouse shall be modified for the PCB storage area to include booties.
7. A satellite hazardous waste disposal container shall be located near the entrance to the PCB storage area for disposal of booties or other potentially PCB contaminated materials.
8. Pallets used to store PCB's shall be considered contaminated and disposed in accordance with all applicable regulations.
9. All equipment used when handling PCB's shall be dedicated to the PCB storage area and not removed from this area until properly decontaminated. All equipment shall be marked with the appropriate M_L or M_S label. Forklifts shall not enter the PCB storage area. A dedicated pallet jack is the only equipment used in the storage area and articles may be pallet-jacked to the edge of the area where a forklift may then lift the article to/from storage and loading/unloading.
10. Inspection of the PCB Storage Area shall be conducted in accordance with the Inspection Plan.

11. PCB spills of any quantity shall be immediately reported to the Emergency Coordinator and the TSCA Contingency Plan shall be implemented. Refer to Appendix D for the TSCA Contingency Plan.
 - a) Specific decontamination requirements are necessary for personnel. Refer to the TSCA Contingency Plan.
 - b) Any size or quantity PCB spill must be cleaned-up immediately and documented according to the TSCA Permit and 40 CFR 761 standards.

E. Transportation

1. Liquid PCB's must be shipped in secondary containment or enclosed vans.
2. Necessary Emergency Response equipment may include, but is not limited to, a salvage drum and absorbent for all PCB shipments.
3. A chain and standards, constructed of material that can readily be decontaminated, disposed, and/or replaced, shall provide a physical entry barrier to the PCB storage area.

IV. RECORDS

All PCB related records shall be located in one central location. Related PCB records include, but are not limited to:

- PCB Commercial Storage Permit
- Inspection Records
- TSCA Contingency Plan
- Annual Document Logs
- In-Coming PCB Manifest copies and supporting paperwork
- Out-Going PCB Manifest copies and supporting paperwork
- Annual Reports
- Certificates of Disposal
- All PCB-Related Correspondence
- Training Records

Facility-issued CD's shall be issued in accordance with the TSCA Permit. A copy of the CD shall be filed with the original incoming manifest. Exception Reporting will be conducted as per 40 CFR 761 and the TSCA Permit.

V. TRAINING

Personnel referenced in the SOP shall receive training based upon their assigned duties. Training records shall be maintained on-site.

VI. IMPACTS/CONSEQUENCES OF DEPARTURE FROM REQUIREMENTS

Improper implementation of this procedure could result in exceedance of facility permitted capacity and exposure to potential violations. The consequence of not following this procedure could result in environmental damage and costly violations and loss of company reputation.

VII. REFERENCES

- A. ~~Emerald Transformer Los Angeles~~Clean Harbors Los Angeles, LLC - PCB Commercial Storage~~ageer~~ Permit
- B. 40 CFR 761

VIII. APPENDICES

- A. Job Hazard Analysis Worksheet
- B. Personal Protective Equipment – Hazard Assessment Record
- C. Workplace Hazard and Personal Protective Equipment Assessment
- D. PCB Guidance Document
- E. PCB Continuation Sheet

APPENDIX A: Job Hazard Analysis Worksheet

JOB HAZARD ANALYSIS WORKSHEET			
FACILITY:	<div style="display: flex; align-items: center;"> <div style="border: 1px solid red; padding: 2px; margin-right: 5px;">Emerald Transformer</div> <div>Clean Harbors</div> </div> Los Angeles, LLC 5756 Alba Street, Los Angeles, California 90058		Polychlorinated Biphenyls SOP
I. JOB/TASK DESCRIPTION: Polychlorinated Biphenyls SOP			
<u>TASK</u> <ul style="list-style-type: none"> Properly manage the receipt, paperwork, storage, equipment, and shipping of PCB material. 	<u>PERSONNEL</u> <ul style="list-style-type: none"> Operations Manager Operations Supervisor Facility Technician Manifest Clerk 	<u>EQUIPMENT</u> <ul style="list-style-type: none"> Pallet Jack Forklift and Attachments Various Containers Pallets Small Tools 	<u>DURATION</u> <ul style="list-style-type: none"> 15 minutes to several hours.
JOB REQUIREMENT/OBJECTIVE: Safely manage the receipt, paperwork, storage, equipment, movement, and shipping of PCB material.			
II. HAZARD IDENTIFICATION: Polychlorinated Biphenyls SOP			
A. OCCUPATIONAL HEALTH CONCERNS			
<u>CHEMICAL AGENTS</u> <ul style="list-style-type: none"> Polychlorinated Biphenyls, Polyhalogenated Biphenyls and various other PCB contaminated materials. PCB cleaning solvents. Other waste chemical hazards not associated with PCBs such as RCRA waste hazards. 	<u>PHYSICAL AGENTS</u> <ul style="list-style-type: none"> PCB spills Dedicated PCB handling equipment Heavy drums, transformers, etc. Pallets Sharps 	<u>BIOLOGICAL AGENTS</u> <ul style="list-style-type: none"> PCB agents ingested or absorbed by contact. PCB carrier solvents easily absorbed through the skin. 	

HEALTH HAZARD EVALUATION: Health hazard risks are low for office personnel and moderate for facility technicians and equipment operators. Facility technicians must be trained in PCB handling and wear the proper personal protective equipment while handling any PCB related materials.

Dedicated equipment shall remain in the PCB storage area for use only for the movement of PCB materials.

All PCB related spills must be reported immediately to a supervisor and proper PPE must be worn during any remediation or response efforts.

B. SAFETY CONCERNS

<u>ACTIONS</u>	<u>CONDITIONS</u>	<u>VEHICLE</u>	<u>PROPERTY</u>
<ul style="list-style-type: none"> • Not processing the paperwork properly. • Improper sampling material that is labeled as PCB. • Misidentifying or misclassifying PCB related materials. • Using non-dedicated equipment to move PCB materials. • Not wearing the proper PPE for handling PCB materials. 	<ul style="list-style-type: none"> • Heavy drums, transformers, material. • PCB material spills. • Heavily contaminated drums, pallets or equipment. • Poor personal hygiene. • Poor decontamination procedures. • Poor equipment maintenance. • Cross-contamination. 	<ul style="list-style-type: none"> • Poor equipment maintenance. • Poor vehicle, truck or trailer maintenance. 	<ul style="list-style-type: none"> • Poor PCB storage area maintenance. • Poor facility maintenance.

SAFETY EVALUATION: Safety risks are low for office personnel and moderate for facility technicians. Facility personnel must not handle or contact directly PCB materials unless they have been specially trained and a Job Safety Briefing conducted.

Personnel must not sample PCB material unless prior approval is obtained from a supervisor.

Personnel must not use PCB-dedicated equipment for moving other materials as cross-contamination could result. Proper material handling techniques must be used for moving heavy drums or transformers. Contaminated containers or equipment must be decontaminated with the proper cleaning agents while wearing proper PPE. If decontamination is not adequate or not practical, contaminated containers must be overpacked.

C. ENVIRONMENTAL CONCERNS
RELEASE TO AIR

- Environmental risks only exist if hazardous materials get released.

RELEASE TO SOIL

- Environmental risks only exist if hazardous materials get released.

RELEASE TO WATER

- Environmental risks only exist if hazardous materials get released.

OTHER

- Not applicable.

ENVIRONMENTAL EVALUATION:

Impact to the environment will not occur if personnel follow procedures and eliminate possible dangers. No migration off-site may occur. Storage areas have secondary containment.

III. JOB HAZARD CONTROL:

Polychlorinated Biphenyls SOP

ENGINEERING

- Job Hazard Analysis is required.
- Job Safety Briefing may be required.
- Dedicated pallet jack is provided for movement of drums in the PCB storage area.

PPE

- Hard hat, safety glasses, steel toed shoes, work uniform at all times.
- Polyethylene coated Tyvek, PVC gloves with Nitrile Inner Gloves, Tyvek booties.
- All extremities shall be covered and taped.

TRAINING

- Job Hazard Analysis training required.
- Job Safety Briefing required.

DECONTAMINATION

- Contaminated PPE must be disposed of in the provided accumulation drum in the PCB storage area.
- Contaminated drums and equipment must be decontaminated with approved cleaning agents.

OTHER

- None.

PERSONNEL RESPONSIBLE FOR CONTROLS:

Engineering controls and training requirements are the responsibility of the Facility Manager, Operations Manager and Operations Supervisor.

IV. JOB HAZARD ANALYSIS SUMMARY & ACTION REQUIRED:

Polychlorinated Biphenyls SOP

There are low to moderate risks associated with handling PCB materials.

The risks of handling can be minimized with proper training, PPE, decontamination, and other procedures. The highest risk is associated with leaking or spilled materials. As long as exposed materials are readily identified and immediately remediated, risks will be minimized and prevent employee exposure risk. Personal protective equipment utilization as defined by this procedure will eliminate any exposures.

In short, there are low risks associated with handling PCB materials that expose workers to injury or illness. As long as all procedures are followed without deviation, there should be no such exposures. All workers have a responsibility to follow procedures and minimize any risks.

APPENDIX B: Personal Protective Equipment Hazard Assessment Record

PERSONAL PROTECTIVE EQUIPMENT HAZARD ASSESSMENT RECORD																
Task at Facility: Polychlorinated Biphenyls SOP		Hazard Categories (Check All Appropriate Items)														
		Mechanical / Physical Hazards (List)								Chemical Hazards			Biological Hazards			
		Manual Container Movements	Sharps from pallets or containers potential	Pinch points from container handling	Splash potential						Contact with PCB residues/materials	Other secondary chemical hazards		Contact with PCB residues/materials		
Parts of Body																
Head	Cranium															
	Ears															
	Eyes				X						X	X		X		
	Respiratory Tract										X	X		X		
	Face															
	Whole Head															
Upper Limbs	Hands	X	X	X							X	X		X		
	Arms		X													
Lower Limbs	Feet	X														
	Legs															
Various	Skin										X	X		X		
	Abdomen															
	Whole Body	X	X		X						X	X		X		

APPENDIX C: Workplace Hazard And Personal Protective Equipment Assessment

1. Location/Task:

Polychlorinated Biphenyls SOP – Handling of PCB materials.

2. Hazards:

Potential carcinogenic hazards associated with PCB materials.

3. PPE Required:

Respiratory protection and gloves only required when contamination or residues are present.

X	Gloves	X	Work Uniform
PVC w/ Inner Nitrile gloves	Specify Type	X	Tyvek
X	Hard Hat +	Polyethylene	Specify Type
X	Safety Glasses		Respirator
	Goggles		Cartridges/Type
	Face Shield	X	Steel Toed Boots
X – When containers are open.	SCBA/Airline	X	Metatarsal Guards

FACILITY GENERAL MANAGER: Steve Peterson

HEALTH & SAFETY MANAGER: Brian Fullen~~Paul Bloom~~

TITLE:	POLYCHLORINATED BIPHENYLS SOP	Page 13 of 15
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APPENDIX D: PCB GUIDANCE DOCUMENT

Labeling and Marking Requirements

Each generator offering a hazardous material for transportation shall mark and label packages in accordance with 49 CFR 172 and ~~Emerald Transformer~~~~Clean Harbors~~ policies.

- Markings and labels must be clear and visible.
- Each container must be marked with the Date-of-Removal-From-Service for Disposal (Out-of-Service Date) or OSD.
- The Generator Unique Identification Number for the container (a generator supplied serial number).
- The generator name must be on the container. (The label is sufficient.)
- The profile number.
- A PCB marking shall be placed on every PCB package. Either the M_L or the M_S marking shall be used.
 - M_L – This label should always be used unless it cannot fit. Two sizes are available (6" x 6" or 2" x 2").
 - M_S – If the item is too small to use the M_L label (6" x 6"), then the small marking, M_S, is used.

Container Condition

No residue may be present on the exterior of the container. If the container is deemed to be contaminated, the container will be overpacked or de-contaminated at the expense of the customer.

Transportation When on ~~Emerald Transformer~~~~Clean Harbors~~ Equipment

Liquid PCBs must be shipped in secondary containment, such as closed vans. Necessary Emergency Response equipment includes, but is not limited to, a salvage drum and absorbent for all PCB shipments. PCBs shall not be double stacked during transportation.

Required Shipping Paperwork

- PCBs must be manifested in kilograms (K).
- The PCB Continuation Sheet must be completed with a separate line for each package.
 - The Generator's Unique Identification Number
 - The facility Unique Identification Number (assigned upon arrival)
 - The profile number
 - The type of PCB item
 - A description of the contents
 - The weight in kilograms (K).
 - Date-of-Removal-from-Service
- Refer to the SOP.

TITLE:	POLYCHLORINATED BIPHENYLS SOP	Page 14 of 15
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Discrepancy Resolution

Generator authorization is required for any discrepancies, changes, cross-outs or additions to the shipping paperwork. All PCB containers must be weighed as manifest discrepancies for weight differences of greater than 10% apply for bulk and non-bulk containers regardless.

Surcharges

Surcharges may be assessed for paperwork discrepancies, poor container condition, or any of the non-conformities referenced in the SOP or above.

Elapsed Time from Date-of-Removal-from-Service to Received Date at Disposer	Surcharge to the Customer
Less than 9 months	None
Between 9 months and 12 months	Surcharge because Disposer only has 90 days to get a Certificate of Disposal back to generator.
After 1 year	Surcharge because Disposer only has 90 days to get a Certificate of Disposal back to generator.

California Regulated PCB versus TSCA Regulated PCB

~~Generally~~Generally, TSCA only regulates PCB waste which contains more than 50 ppm of PCBs. Exceptions to this include the following:

- Any waste that has or had 50 ppm or more of PCB is always treated as if it contained more than 50 ppm, even if the concentration later drops below 50 ppm.
- If a waste concentration originally exceeds 50 ppm of PCB, then any resulting waste from dilution, spills, or leaks is regulated as if it were its original concentration. TSCA prohibits dilution of a PCB waste to avoid regulation.

California regulates PCB waste if it contains 5 ppm or greater of PCBs.

Sources for Additional Information

- ~~Emerald Transformer~~~~Clean Harbors~~ Los Angeles, LLC - PCB Commercial Storage ~~ageer~~ Permit
- 40 CFR 761

**APPENDIX E
PCB CONTINUATION SHEET**

Manifest Tracking Number_____

GENERATOR'S UNIQUE IDENTIFICATION NUMBER OR PCB ARTICLE SERIAL NUMBER	PROFILE NUMBER	TYPE OF PCB ITEM	DESCRIPTION OF CONTENTS	WEIGHT IN KILOGRAMS	DATE-OF- REMOVAL- FROM- SERVICE MM/DD/YY

APPENDIX B

Compliance History

The ~~Emerald TransformerClean Harbors~~ Los Angeles, LLC (~~formerly Clean Harbors Los Angeles, LLC~~) regulatory compliance history for the past five years is summarized in the table below.

Date	Agency	Program	Activity	Findings	Result
04/25/17 10/27/2010	DTSC DTSC	RCRA RCRA	Inspection Inspection	<p>DTSC conducted a 3 day inspection.</p> <p><u>Alleged violations:</u></p> <ul style="list-style-type: none"> • <u>One open container holding waste was found.</u> • <u>One transformer was found to be stored in an unpermitted area.</u> • <u>Cracks were found in a containment berm.</u> • <u>Two containers were found missing hazardous waste labels.</u> • DTSC conducted a 3-day annual inspection. Alleged violations: <p>Level of a tank did not match pump records.</p> <p>Overfill control on a tank was not operating properly.</p> <p>Malfunction was not noted on inspection log.</p> <p>A container was not marked as Hazardous Waste.</p> <p>The top of a container was left open.</p> <p>A spill kit had been moved.</p> <p>A component of the 2009 RCRA Annual Report could not be located—corrected during the inspection.</p>	All findings were corrected without in penalty. Pending
11/03/16 10/18/2017	DTSC DTSC	RCRA CalRe	Inspection Inspection	Alleged violations:	All findings were corrected without in

TSCA COMMERCIAL STORAGE PERMIT

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~~Emerald TransformerClean Harbors~~ Los Angeles, LLC

~~October~~ December 2017

COMPLIANCE HISTORY

Date	Agency	Program	Activity	Findings	Result
2010	SC	eyele	spection	<ul style="list-style-type: none"> Storage of hazardous waste in an unpermitted area. Scrap metal leaking oil onto the warehouse floor. Cracks in containment unit. Rolloff dumpster missing hazardous waste label. 	penalty. No issues.
04/28/1609/30/2010	DTSC City of Los Angeles	RCRA Fire Department	Inspection	<p>Alleged violation:</p> <ul style="list-style-type: none"> Failure to provide tank assessments for 3 out of service tanks. 	Tank assessments for the tanks in question were provided to the DTSC and the violation was removed. No issues.
06/26/201509/22/2010	RWQCB City of Los Angeles	Stormwater Wastewater	Inspection	<p>Alleged violation:</p> <ul style="list-style-type: none"> Failure to submit a Notice of Intent. 	The Los Angeles facility has a permit for industrial discharge granted by the City of Los Angeles Bureau of Sanitation. The facility submitted a Non-Exposure Certification to the RWQCB and the violation was removed. No issues.
05/12/1508/11/2010	DTSC DTSC	RCRA CalRe eyele	Inspection	<p>Alleged violation:</p> <ul style="list-style-type: none"> Violation of hazardous waste 10-day transfer rule. Fire Program ID permit not displayed. 	DTSC identified several manifests which were believed to have exceeded 10 days of transfer storage at the facility. The facility was able to demonstrate that none of the manifests were ever transferred through the plant. The violation was removed. Resolved. No violations.
10/21/1307/19/2010	DTSC City of Los Angeles	RCRA Bldg & Safety	Inspection	<p>Alleged violation:</p> <ul style="list-style-type: none"> Violation of hazardous waste 10-day transfer rule. Failure to submit Quarterly Used Oil Report. 	<p>Inspector found a transfer tanker truck load that was shipped on its 11th day. The facility provided an explanation as to why the load was not shipped in a timely manner.</p> <p>The facility provided the Used Oil Quarterly report to the DTSC as</p>

Date	Agency	Program	Activity	Findings	Result
					requested. No issues.
06/23/2010	City of Los Angeles	Wastewater	Inspection	No issues.	No issues.
05/14/2010	City of Los Angeles	Wastewater	NOV	No 48-hr presampling notification. Mercury exceedence from 2/28/10 discharge.	Rescinded. No violations. City found our notification and had read wrong column on analytical report.
02/03/2010	City of Los Angeles	Wastewater	NOV	Sulfide exceedence from 10/26/09 stormwater discharge	Closed. No violation.
01/14/2010	CA Air Resource s Board	South Coast Air Quality Mgmt District	Inspection	No issues.	No issues.
11/17/2009	City of Los Angeles	Fire Department	NOV	Emergency exit light and alarm panel in need of repair.	Closed. No violations.
07/16/2009	EPA	TSCA	Inspection	No issues.	No issues.
05/15/2009	CA Air Resource s Board	South Coast Air Quality Mgmt District	Inspection	No issues.	No issues.
03/24/2009	DTSC	RCRA	Inspection	Annual inspection. Alleged violations: Quantity in isotainer did not match pump record No written procedure for annual tank integrity inspection Malfunction not recorded in the inspection log.	Resolved. No violations.
06/22/2007	DTSC	RCRA	Inspection	Annual inspection. Alleged violations: 1) PCBs stored and handled outside of permitted areas. 2) CA regulated PCBs stored in Tank V-	Consent Order with permit modification to clarify CA PCBs, no TSCA PCBs could be held in V-10. Personnel retrained. Inactive tanks to being closed. Penalty \$42,500.

Date	Agency	Program	Activity	Findings	Result
				10-3) Failed to submit permit modification for use of stationary crane. 4) Oil leak not cleaned up. 5) Inspections not performed on inactive tanks.	
05/25/2006	DTSC	RCRA	NOV	Errors found on manifests	Resolved. Penalty \$2,560.
03/24/2006	DTSC	RCRA	NOV	Spill not reported to DTSC.	Resolved w/o penalty.
02/24/2006	DTSC	RCRA	NOV	Facility Certificate of Insurance did not have correct information.	Resolved w/o penalty.